



August 8, 1995

Mr. Salvatore Ciriello
Permitting Branch Chief
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 300
Berkeley, California 94710

Dear Mr. Ciriello:

Pursuant to 40CFR Part 270.42, Advanced Environmental Technical Services (AETS) is requesting a modification of its permit to include the newly listed waste codes referenced in the Federal Register on February 9, 1995 (60 FR 7824).

On May 19, 1995, a permit modification was submitted to change operational control from Advanced Environmental Technology Corporation (AETC) to Advanced Environmental Technical Services (AETS) owned by Advanced Environmental Technical Services.

AETS operates a permitted hazardous waste consolidation and transfer facility which accepts waste materials from off-site generators for proper treatment or disposal at off-site fully permitted facilities. No treatment or disposal activities take place on the AETC site.

AETS currently handles the materials indicated as newly listed wastes in a manner consistent with all other materials coming through the facility. It will not be necessary to modify any operations to handle these newly listed wastes since no treatment is done on site.

According to 40CFR270.42(g), AETS will be eligible to continue managing the new wastes while steps necessary to obtain a permit modification allowing continued management of these wastes be taken. AETS intends to take all steps necessary to satisfy the requirements.

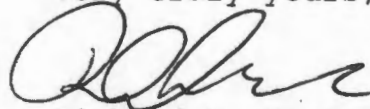
Attached is a list indicating the newly listed waste codes AETS would like added to the permit, along with a modified Part A application reflecting the change.

If this notification is satisfactory or you need further information, please respond to me in writing to:

3 Gold Mine Road
Flanders, NJ 07836

I can also be reached at (201)691-3937.

Very truly yours,



Richard A. Daniels
Manager, Facility Permitting

Attachment

cc: USEPA Region 9

TABLE 1

CARBAMATE PRODUCTION WASTES

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
K156	Organic waste (including heavy ends, still bottoms, light ends, spent solvents, filtrates, and decantates) from the production of carbamates and carbamoyl oximes.	(T)
K157	Wastewaters (including scrubber waters, condenser waters, washwaters, and separation waters) from the production of carbamates and carbamoyl oximes.	(T)
K158	Bag house dusts and filter/separation solids from the production of carbamates and carbamoyl oximes.	(T)
K159	Organics from the treatment of thiocarbamate wastes.	(T)
K160	Solids (including filter wastes, separation solids, and spent catalysts) from the production of thiocarbamates and solids from the treatment of thiocarbamate wastes.	(T)
K161	Purification solids (including filtration, evaporation, and centrifugation solids), bag house dust and floor sweepings from the production of dithiocarbamate acids and their salts. (This listing does not include K125 or K126.).	(R,T)

TABLE 1

Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof.

Hazardous waste No.	Chemical abstracts No.	Substance
P127	1563-66-2	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-, methylcarbamate. (Carbofuran)
P128	315-18-4	Phenol, 4-(dimethylamino)-3,5-dimethyl-, methylcarbamate (ester). (Mexacarbate)
P185	16419-73-8	1,3-Dithiolane-2-carboxaldehyde, 2,4-dimethyl-, O-[(methylamino)-carbonyl]oxime. (Tirpate)
P188	57-64-7	Benzoic acid, 2-hydroxy-, compd. with (3aS-cis)-1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethylpyrrolo[2,3-b]indol-5-yl methylcarbamate ester (1:1). (Physostigmine salicylate)
P189	55285-14-8	Carbamic acid, [(dibutylamino)-thio]methyl-, 2,3-dihydro-2,2-dimethyl-7-benzofuranyl ester. (Carbosulfan)
P190	1129-41-5	Carbamic acid, methyl-, 3-methylphenyl ester. (Metolcarb)
P191	644-64-4	Carbamic acid, dimethyl-, 1-[(dimethylamino)carbonyl]-5-methyl-1H-pyrazol-3-yl ester. (Dimetilan)
P192	119-38-0	Carbamic acid, dimethyl-, 3-methyl-1-(1-methylethyl)-1H-pyrazol-5-yl ester. (Isolan)
P194	23135-22-0	Ethanimidothioic acid, 2-(dimethylamino)-N-[[[(methylamino) carbonyl]oxy]-2-oxo-, methyl ester. (Oxamyl)
P196	15339-36-3	Manganese, bis(dimethylcarbamo-dithioato-S,S')-, (Manganese dimethyldithiocarbamate)
P197	17702-57-7	Methanimidamide, N,N-dimethyl-N'-[2-methyl-4-[[[(methylamino)carbonyl]oxy]phenyl]-] (Formparanate)
P198	13422-53-9	Methanimidamide, N,N-dimethyl-N'-[3-[[[(methylamino)-carbonyl]oxy]phenyl]-, monohydrochloride. (Formetanate hydrochloride)
P199	2032-65-7	Phenol, (3,5-dimethyl-4-(methylthio)-, methylcarbamate (Methiocarb)
P201	2631-37-0	Phenol, 3-methyl-5-(1-methylethyl)-, methyl carbamate. (Promecarb)
P202	64-00-6	Phenol, 3-(1-methylethyl)-, methyl carbamate. (3-Isopropylphenyl N-methylcarbamate or m-Cumenyl methylcarbamate)
P203	1646-88-4	Propanal, 2-methyl-2-(methyl-sulfonyl)-, O-[(methylamino)carbonyl] oxime. (Aldicarb sulfone)
P204	57-47-6	Pyrrolo[2,3-b]indol-5-ol, 1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethyl-, methylcarbamate (ester), (3aS-cis)-. (Physostigmine)
P205	137-30-4	Zinc, bis(dimethylcarbamo-dithioato-S,S')-, (Ziram)


TABLE 1

Hazardous waste No.	Chemical abstracts No.	Substance
U271	17804-35-2	Carbamic acid, [1-[(butylamino)carbonyl]-1H-benzimidazol-2-yl]-, methyl ester. (Benomyl)
U277	95-06-7	Carbamodithioic acid, diethyl-, 2-chloro-2-propenyl ester. (Sulfallate)
U278	22781-23-3	1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate. (Bendiocarb)
U279	63-25-2	1-Naphthalenol, methylcarbamate. (Carbaryl)
U280	101-27-9	Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butynyl ester. (Barban)
U364	22961-82-6	1,3-Benzodioxol-4-ol, 2,2-dimethyl-, (Bendiocarb phenol)
U365	2212-67-1	H-Azepine-1-carbothioic acid, hexahydro-, S-ethyl ester. (Molinate)
U366	533-74-4	2H-1,3,5-Thiadiazine-2-thione, tetrahydro-3,5-dimethyl- (Dazomet)
U367	1563-38-8	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl- (Carbofuran phenol)
U372	10605-21-7	Carbamic acid, 1H-benzimidazol-2-yl, methyl ester. (Carbendazim)
U373	122-42-9	Carbamic acid, phenyl-, 1-methylethyl ester. (Propham)
U375	55406-53-6	Carbamic acid, butyl-, 3-iodo-2-propynyl ester. (3-Iodo-2-propynyl n-butylcarbamate)
U376	144-34-3	Carbamodithioic acid, dimethyl-, tetraanhydrosulfide with orthothioselenious acid. (Selenium, tetrakis(dimethyldithiocarbamate))
U377	137-41-7	Carbamodithioic acid, methyl-, monopotassium salt. (Potassium n-methyldithiocarbamate)
U378	51026-28-9	Carbamodithioic acid, (hydroxymethyl)methyl-, monopotassium salt. (Potassium n-hydroxymethyl-n-methyldithiocarbamate)
U379	136-30-1	Carbamodithioic acid, dibutyl, sodium salt. (Sodium dibutyldithiocarbamate)
U381	148-18-5	Carbamodithioic acid, diethyl-, sodium salt. (Sodium diethyldithiocarbamate)
U382	128-04-1	Carbamodithioic acid, dimethyl-, sodium salt. (Sodium dimethyldithiocarbamate)
U383	128-03-0	Carbamodithioic acid, dimethyl, potassium salt. (Potassium dimethyldithiocarbamate)
U384	137-42-8	Carbamodithioic acid, methyl-, monosodium salt. (Metam Sodium)
U385	1929-77-7	Carbamothioic acid, dipropyl-, S-propyl ester. (Vernolate)
U386	1134-23-2	Carbamothioic acid, cyclohexylethyl-, S-ethyl ester. (Cycloate)
U387	52888-80-9	Carbamothioic acid, dipropyl-, S-(phenylmethyl) ester. (Prosulfocarb)

TABLE 1

Hazardous waste No.	Chemical abstracts No.	Substance
U389	2303-17-5	Carbamothioic acid, bis(1-methylethyl)-, S-(2,3,3-trichloro-2-propenyl) ester. (Triallate)
U390	759-94-4	Carbamothioic acid, dipropyl-, S-ethyl ester. (EPTC)
U391	1114-71-2	Carbamothioic acid, butylethyl-, S- propyl ester. (Pebulate)
U392	2008-41-5	Carbamothioic acid, bis(2-methylpropyl)-, S-ethyl ester. (Butylate)
U393	137-29-1	Copper, bis(dimethylcarbamodithioato- S,S')-, (Copper dimethyldithiocarbamate)
U394	30558-43-1	Ethanimidothioic acid, 2-(dimethylamino)- N-hydroxy-2-oxo-, methyl ester. (A2213)
U395	5952-26-1	Ethanol, 2,2'-oxybis-, dicarbamate. (Diethylene glycol, dicarbamate)
U396	14484-64-1	Iron, tris(dimethylcarbamodithioato- S,S')-, (Ferbam)
U400	120-54-7	Piperidine, 1,1'-(tetrathiodi- carbonothioyl)-bis- (Bis(pentamethylene) thiuram tetrasulfide)
U401	97-74-5	Bis(dimethylthiocarbamoyl) sulfide. (Tetramethylthiuram monosulfide)
U402	1634-02-2	Thioperoxydicarbonic diamide, tetrabutyl. (Tetrabutylthiuram disulfide)
U403	97-77-8	Thioperoxydicarbonic diamide, tetraethyl. (Disulfiram)
U404	121-44-8	Ethanamine, N,N-diethyl- (Triethylamine)
U407	14324-55-1	Zinc, bis(diethylcarbamodithioato-S,S')- (Ethyl Ziram)
U409	23564-05-8	Carbamic acid, [1,2-phenylenebis (iminocarbonothioyl)]bis-, dimethyl ester. (Thiophanate-methyl)
U410	59669-26-0	Ethanimidothioic acid, N,N'-[thiobis- [(methylimino)carbonyloxy]]bis-, dimethyl ester (Thiodicarb)
U411	114-26-1	Phenol, 2-(1-methylethoxy)-, methylcarbamate. (Propoxur)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

<p>For EPA Regional Use Only</p>	 United States Environmental Protection Agency Washington, DC 20460 <h2 style="margin: 10px 0;">Hazardous Waste Permit Application</h2> <h3 style="margin: 0;">Part A</h3> <p><i>(Read the Instructions before starting)</i></p>
<p>Date Received</p> <p>Month Day Year</p>	

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<input type="checkbox"/> A. First Part A Submission	<input checked="" type="checkbox"/> B. Part A Amendment # _____
--	--

C. Installation's EPA ID Number	D. Secondary ID Number (If applicable)
C A T 0 8 0 0 1 4 0 7 9	

II. Name of Facility

Advanced Environmental Technical Services

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street

1 1 2 5 H e n s l e y S t r e e t

Street (Continued)

City or Town **State** **Zip Code**

R i c h m o n d C A 9 4 8 0 4 -

County Code (If known) **County Name**

C o n t r a C o s t a

B. Land Type **C. Geographic Location** **D. Facility Existence Date**

(Enter code)	LATITUDE (Degrees, Minutes, & Seconds)	LONGITUDE (Degrees, Minutes & Seconds)	Month	Day	Year
	3 7 5 6 0 5 6	1 2 2 2 1 0 4 9	0 7	0 1	1 9 8 3

IV. Facility Mailing Address

Street or P.O. Box

S a m e

City or Town **State** **Zip Code**

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (Last) **(First)**

L e e s D o n a l d

Job Title **Phone Number (Area Code and Number)**

V.P. Western Region 5 1 0 - 7 8 2 - 7 0 0 0

VI. Facility Contact Address (See Instructions)

A. Contact Address **B. Street or P.O. Box**

Location Mailing Other 1 9 4 1 0 C a b o t B o u l e v a r d

City or Town **State** **Zip Code**

H a y w a r d C A 9 4 5 4 5 -

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

VII. Operator Information (See instructions)

Name of Operator

Advanced Environmental Technical Services

Street or P.O. Box

1 1 2 5 H e n s l e y S t r e e t

City or Town

R i c h m o n d

State

ZIP Code

C A

9 4 8 0 4 -

Phone Number (Area Code and Number)

6 1 0 - 2 3 3 - 8 0 0 1

B. Operator Type

P

C. Change of Operator

Indicator

Yes

X

No

Date Changed

Month

Day

Year

0 1

0 1

9 6

VIII. Facility Owner (See instructions)

A. Name of Facility's Legal Owner

Advanced Environmental Technical Services

Street or P.O. Box

3 G o l d M i n e R o a d

City or Town

F l a n d e r s

State

ZIP Code

N J

0 7 8 3 6 -

Phone Number (Area Code and Number)

2 0 1 - 3 4 7 - 7 1 1 1

B. Owner Type

P

C. Change of Owner

Indicator

Yes

X

No

Date Changed

Month

Day

Year

0 1

0 1

9 6

IX. SIC Codes (4-digit, in order of significance)

Primary

Secondary

8 9 9 9 (Description) Services, N.E.C.

(Description)

Secondary

Secondary

(Description)

(Description)

X. Other Environmental Permits (See instructions)

A. Permit Type
(Enter code)

B. Permit Number

C. Description

R

E

E

E

E

E

C A T 0 8 0 0 1 4 0 7 9

2 0 7 S 0 0 3 9 9 4

F P 0 0 5 4 1

N A

C U 9 2 - 4 9

1 3 4 3 5

RCRA Part B Permit

Stormwater Discharge

Fire Dept. Hazardous Mat. Storage

POTW Discharge City of Richmond

Conditional Use Permit

Auth. to Construct BAQMD

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T O 8 0 0 1 4 0 7 9

XI. Nature of Business (Provide a brief description)

Hazardous Waste Transfer and Storage Facility

In addition, AETS will bulk petroleum hydrocarbon - contaminated soil and debris, household hazardous waste, materials with economic value destined for recycling and a drum crusher on site.

XII. Process Codes and Design Capacities

A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XII.

B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.

1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Disposal:</u>					
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Btu's Per Hour
D80	Landfill	Acre-feet or Hectare-meter	T88	Titanium Dioxide Chloride Process Oxidation Reactor	
D81	Land Treatment	Acres or Hectares	T89	Methane Reforming Furnace	
D82	Ocean Disposal	Gallons Per Day r Liters Per Day	T90	Pulping Liquor Recovery Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
D99	Other Disposal	Any Unit of Measure Listed Below	T92	Halogen Acid Furnaces	
<u>Storage:</u>			T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters	T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
S02	Tank	Gallons or Liters	<u>Miscellaneous (Subpart X):</u>		
S03	Waste Pile	Cubic Yards or Cubic Meters	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
S04	Surface Impoundment	Gallons or Liters	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
S05	Drip Pad	Gallons or Liters	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
S06	Containment Building-Storage	Cubic Yards or Cubic Meters	X04	Geologic Repository	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below	X99	Other Subpart X	Any Unit of Measure Listed Below
<u>Treatment:</u>					
T01	Tank	Gallons Per Day or Liters Per Day			
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boller	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			

UNIT OF MEASURE
UNIT OF MEASURE CODE

Gallons G
Gallons Per Hour E
Gallons Per Day U
Liters L
Liters Per Hour H
Liters Per Day V

UNIT OF MEASURE
UNIT OF MEASURE CODE

Short Tons Per Hour D
Metric Tons Per Hour W
Short Tons Per Day N
Metric Tons Per Day S
Pounds Per Hour J
Kilograms Per Hour R

UNIT OF MEASURE
UNIT OF MEASURE CODE

Cubic Yards Y
Cubic Meters C
Acres B
Acre-feet A
Hectares Q
Hectare-meter F
Btu's Per Hour I

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only
		1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	S 0 2	5 3 3 7 8 8	G	0 0 1	
1	S 0 1	6 1 6 0 0	G		
2	T 0 4	6 0	Y		
3					
4					
5					
6					
7					
8					
9					
1 0					
1 1					
1 2					
1 3					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter as in seg w/XII)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
		1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	T 0 4				In-situ Vitrification
1	T 0 4	6 0	Y	001	Consolidation of Petroleum Contaminated Soils
2					
3					
4					

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous waste that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS									
							(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X 1	K	0	5	4	900	P	T	0	3	D	8	0				
X 2	D	0	0	2	400	P	T	0	3	D	8	0				
X 3	D	0	0	1	100	P	T	0	3	D	8	0				
X 4	D	0	0	2												Included With Above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-580004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY																						
W	C	A	T	0	8	0	0	1	4	0	7	9	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0
										DUP																						

1. DESCRIPTION OF HAZARDOUS WASTES (continued)																																							
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)										B. ESTIMATED ANNUAL QUANTITY OF WASTE										C. UNIT OF MEASURE (enter code)	D. PROCESSES																	
																						1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
	01	02	03	04	05	06	07	08	09	10		01	02	03	04	05	06	07	08	09	10		01	02	03	04	05	06	07	08	09	10							
1	D	0	0	1							375											T			S	0	1												
2	D	0	0	2							250											T			S	0	1												
3	D	0	0	3							13											T			S	0	1												
4	D	0	0	4							6											T			S	0	1												
5	D	0	0	5							6											T			S	0	1												
6	D	0	0	6							6											T			S	0	1												
7	D	0	0	7							6											T			S	0	1												
8	D	0	0	8							6											T			S	0	1												
9	D	0	0	9							6											T			S	0	1												
10	D	0	1	0							250											T			S	0	1												
11	D	0	1	1							250											P			S	0	1												
12	D	0	1	2							250											P			S	0	1												
13	D	0	1	3							250											P			S	0	1												
14	D	0	1	4							250											P			S	0	1												
15	D	0	1	5							250											P			S	0	1												
16	D	0	1	6							250											P			S	0	1												
17	D	0	1	7							250											P			S	0	1												
18	F	0	0	1							50											T			S	0	1												
19	F	0	0	2							75											T			S	0	1												
20	F	0	0	3							250											T			S	0	1												
21	F	0	0	4							5											T			S	0	1												
22	F	0	0	5							50											T			S	0	1												
23	F	0	0	6							25											T			S	0	1												
	F	0	0	7							2500											P			S	0	1												
24	F	0	0	8							2500											P			S	0	1												
25	F	0	0	9							2500											P			S	0	1												
26	F	0	0	0							2500											P			S	0	1												

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY															
W	C	A	T	0	8	0	0	1	4	0	7	9	1	W	DUP					2	DUP				

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTENO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES												1. PROCESS DESCRIPTION (if a code is not entered in D(1))
	01	02	03	04			1. PROCESS CODES (enter)												
1	F	0	1	0	700	P	S	0	1										
2	F	0	1	1	850	P	S	0	1										
3	F	0	1	2	900	P	S	0	1										
4	F	0	1	9	900	P	S	0	1										
5	F	0	2	0	500	P	S	0	1										
6	F	0	2	1	400	P	S	0	1										
7	F	0	2	2	500	P	S	0	1										
8	F	0	2	3	600	P	S	0	1										
9	F	0	2	4	700	P	S	0	1										
10	F	0	2	6	900	P	S	0	1										
	F	0	2	7	900	P	S	0	1										
12	F	0	2	8	900	P	S	0	1										
13	K	0	0	1	1500	P	S	0	1										
14	K	0	0	2	900	P	S	0	1										
15	K	0	0	3	1400	P	S	0	1										
16	K	0	0	4	900	P	S	0	1										
17	K	0	0	5	900	P	S	0	1										
18	K	0	0	6	900	P	S	0	1										
19	K	0	0	7	1400	P	S	0	1										
20	K	0	0	8	900	P	S	0	1										
21	K	0	0	9	550	P	S	0	1										
22	K	0	1	0	900	P	S	0	1										
23	K	0	1	1	1400	P	S	0	1										
	K	0	1	3	300	P	S	0	1										
25	K	0	1	4	750	P	S	0	1										
26	K	0	1	5	900	P	S	0	1										

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Form Approved OMB No. 1545-0046

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY												
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22			
W	C	A	T	O	B	0	0	1	4	0	7	9	DUP						2	DUP				

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
	1	2			1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
1	K	016	900	P	S	0	1							
2	K	017	900	P	S	0	1							
3	K	018	900	P	S	0	1							
4	K	019	900	P	S	0	1							
5	K	020	850	P	S	0	1							
6	K	021	500	P	S	0	1							
7	K	022	900	P	S	0	1							
8	K	023	750	P	S	0	1							
9	K	024	900	P	S	0	1							
10	K	093	500	P	S	0	1							
11	K	094	750	P	S	0	1							
12	K	025	750	P	S	0	1							
13	K	026	900	P	S	0	1							
14	K	027	900	P	S	0	1							
15	K	028	900	P	S	0	1							
16	K	029	950	P	S	0	1							
17	K	095	700	P	S	0	1							
18	K	096	550	P	S	0	1							
19	K	030	750	P	S	0	1							
20	K	083	700	P	S	0	1							
21	K	103	700	P	S	0	1							
22	K	104	600	P	S	0	1							
23	K	085	900	P	S	0	1							
24	K	105	900	P	S	0	1							
25	K	071	700	P	S	0	1							
26	K	073	850	P	S	0	1							

Continued from page 2.

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Form Approved OMB No. 158-SB0004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY													
W	C	A	T	0	8	0	0	1	4	0	7	9	1	W	DUP				2	DUP			

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

V. DESCRIPTION OF HAZARDOUS WASTE					D. PROCESSES																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
	A1	A2	A3	A4			P1	P2	P3	P4	P5	P6	P7	P8	P9	P10	P11	P12																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
1	K	1	0	6	900		P	S	0	1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									</

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY														
W	C	A	T	0	8	0	0	1	4	0	7	9	W	DUP					2	DUP				

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES												E. PROCESS DESCRIPTION (if a code is not entered in D(1))																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
	16	17	18	19			20	21	22	23	24	25	26	27	28	29	30																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
1	K	0	4	4	750	P	S	0	1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											</

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Form Approved OMB No. 15B-S80004

EPA I.D. NUMBER (enter from page 1)				FOR OFFICIAL USE ONLY			
WIC 018 000 4079				WIC DUP 2 DUP			
DESCRIPTION OF HAZARDOUS WASTES (continued)							
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES			
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))		
1	P0139	900	P	S01			
2	P040	950	P	S01			
3	P0411	900	P	S01			
4	P0412	700	P	S01			
5	P0413	250	P	S01			
6	P0414	900	P	S01			
7	P0415	750	P	S01			
8	P0416	900	P	S01			
9	P0417	300	P	S01			
10	K0611	700	P	S01			
	K0612	350	P	S01			
12	K0619	900	P	S01			
13	K11010	900	P	S01			
14	K10814	900	P	S01			
15	K11011	350	P	S01			
16	K11012	900	P	S01			
17	K10816	700	P	S01			
18	K10610	900	P	S01			
19	K0817	700	P	S01			
20	P01011	900	P	S01			
21	P0012	300	P	S01			
22	P0013	750	P	S01			
23	P01041	225	P	S01			
24	P01051	225	P	S01			
25	P0106	750	P	S01			
26	P0007	350	P	S01			

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
WIC 82 0 81 01 01 1 4 01 71 91	W	DUP	DUP

7. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (ICRIST)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P 0 0 8	900	P	S 0 1	
2	P 0 0 9	850	P	S 0 1	
3	P 0 1 0	225	P	S 0 1	
4	P 0 1 1	225	P	S 0 1	
5	P 0 1 2	225	P	S 0 1	
6	P 0 1 3	1400	P	S 0 1	
7	P 0 1 4	225	P	S 0 1	
8	P 0 1 5	2000	P	S 0 1	
9	P 0 1 6	225	P	S 0 1	
10	P 0 4 8	225	P	S 0 1	
11	P 0 4 9	900	P	S 0 1	
12	P 0 5 0	900	P	S 0 1	
13	P 0 5 1	1200	P	S 0 1	
14	P 0 5 4	750	P	S 0 1	
15	P 0 5 6	700	P	S 0 1	
16	P 0 5 7	600	P	S 0 1	
17	P 0 5 8	850	P	S 0 1	
18	P 0 5 9	900	P	S 0 1	
19	P 0 6 0	900	P	S 0 1	
20	P 0 6 2	900	P	S 0 1	
21	P 0 6 4	225	P	S 0 1	
22	P 0 6 5	800	P	S 0 1	
23	P 0 6 6	800	P	S 0 1	
24	P 0 6 7	450	P	S 0 1	
25	P 0 6 8	225	P	S 0 1	
26	P 0 6 9	700	P	S 0 1	

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DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
	1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
	11	12		13	14	15	16	17	18	19	20	21	22	23
1	P	0	700	P	S	0	1							
2	P	0	900	P	S	0	1							
3	P	0	950	P	S	0	1							
4	P	0	500	P	S	0	1							
5	P	0	1250	P	S	0	1							
6	P	0	700	P	S	0	1							
7	P	0	500	P	S	0	1							
8	P	0	225	P	S	0	1							
9	P	0	750	P	S	0	1							
10	P	0	500	P	S	0	1							
11	P	0	225	P	S	0	1							
12	P	0	500	P	S	0	1							
13	P	0	900	P	S	0	1							
14	P	0	350	P	S	0	1							
15	P	0	900	P	S	0	1							
16	P	0	900	P	S	0	1							
17	P	0	700	P	S	0	1							
18	P	0	700	P	S	0	1							
19	P	0	900	P	S	0	1							
20	P	0	550	P	S	0	1							
21	P	0	900	P	S	0	1							
22	P	0	700	P	S	0	1							
23	P	0	1300	P	S	0	1							
24	P	0	900	P	S	0	1							
25	P	1	225	P	S	0	1							
26	P	1	900	P	S	0	1							

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EPA I.D. NUMBER (enter from page 1)			FOR OFFICIAL USE ONLY		
W.C.A.T. 03:0.0.1.4.0.7.9			W	DUP	
V. DESCRIPTION OF HAZARDOUS WASTES (continued)					
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P1103	800	P	S 0 1	
2	P1104	900	P	S 0 1	
3	P1105	900	P	S 0 1	
4	P1106	800	P	S 0 1	
5	P1107	850	P	S 0 1	
6	P1108	900	P	S 0 1	
7	P1109	700	P	S 0 1	
8	P1110	700	P	S 0 1	
9	P1111	600	P	S 0 1	
10	P1112	750	P	S 0 1	
11	P1113	850	P	S 0 1	
12	P1114	750	P	S 0 1	
13	P1115	900	P	S 0 1	
14	P1116	700	P	S 0 1	
15	P1118	900	P	S 0 1	
16	P1119	900	P	S 0 1	
17	P1120	900	P	S 0 1	
18	P1121	950	P	S 0 1	
19	P1122	225	P	S 0 1	
20	P1123	900	P	S 0 1	
21	U0101	300	P	S 0 1	
22	U0102	1000	P	S 0 1	
23	U0103	300	P	S 0 1	
24	U0104	900	P	S 0 1	
25	U0105	700	P	S 0 1	
26	U0106	300	P	S 0 1	

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EPA I.D. NUMBER (enter from page 1)			FOR OFFICIAL USE ONLY		
UIC: 202 010 1 410179			WI	DUP	
DESCRIPTION OF HAZARDOUS WASTES (continued)					
LINE NO.	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U 01017	1200	P	S 0 1	
2	U 01018	1600	P	S 0 1	
3	U 01019	500	P	S 0 1	
4	U 01110	900	P	S 0 1	
5	U 01111	700	P	S 0 1	
6	U 01112	900	P	S 0 1	
7	U 01114	700	P	S 0 1	
8	U 01115	750	P	S 0 1	
9	U 01116	900	P	S 0 1	
10	U 01117	700	P	S 0 1	
11	U 01118	750	P	S 0 1	
12	U 01119	900	P	S 0 1	
13	U 01210	950	P	S 0 1	
14	U 01211	250	P	S 0 1	
15	U 01212	900	P	S 0 1	
16	U 01213	350	P	S 0 1	
17	U 01214	900	P	S 0 1	
18	U 01215	700	P	S 0 1	
19	U 01216	900	P	S 0 1	
20	U 01217	900	P	S 0 1	
21	U 01218	500	P	S 0 1	
22	U 01219	900	P	S 0 1	
23	U 01310	500	P	S 0 1	
24	U 01311	900	P	S 0 1	
25	U 01312	750	P	S 0 1	
26	U 01313	900	P	S 0 1	

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CPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
VICAT 9 81010140179		W DUP	

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U101314	800	P	S 0 1	
2	U101315	850	P	S 0 1	
3	U101316	500	P	S 0 1	
4	U101317	900	P	S 0 1	
5	U101318	750	P	S 0 1	
6	U101319	850	P	S 0 1	
7	U101411	950	P	S 0 1	
8	U101412	900	P	S 0 1	
9	U101413	50	P	S 0 1	
10	U101414	2000	P	S 0 1	
11	U101415	900	P	S 0 1	
12	U101416	900	P	S 0 1	
13	U101417	500	P	S 0 1	
14	U101418	800	P	S 0 1	
15	U101419	900	P	S 0 1	
16	U101510	900	P	S 0 1	
17	U101511	1000	P	S 0 1	
18	U101512	750	P	S 0 1	
19	U101513	250	P	S 0 1	
20	U101515	1600	P	S 0 1	
21	U101516	250	P	S 0 1	
22	U101517	900	P	S 0 1	
23	U101518	900	P	S 0 1	
24	U101519	700	P	S 0 1	
25	U101610	750	P	S 0 1	
26	U101611	750	P	S 0 1	

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WIC 008004079										W DUP									
7. DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	U0819	250	P	S	0	1													
2	U0900	900	P	S	0	1													
3	U0911	1300	P	S	0	1													
4	U0922	900	P	S	0	1													
5	U0933	700	P	S	0	1													
6	U0944	900	P	S	0	1													
7	U0955	900	P	S	0	1													
8	U0966	700	P	S	0	1													
9	U0977	700	P	S	0	1													
10	U0988	250	P	S	0	1													
11	U0999	250	P	S	0	1													
12	U1101	750	P	S	0	1													
13	U11012	250	P	S	0	1													
14	U11013	250	P	S	0	1													
15	U11015	900	P	S	0	1													
16	U11016	250	P	S	0	1													
17	U11017	900	P	S	0	1													
18	U11018	900	P	S	0	1													
19	U11019	900	P	S	0	1													
20	U11110	700	P	S	0	1													
21	U11111	700	P	S	0	1													
22	U11112	750	P	S	0	1													
23	U11113	250	P	S	0	1													
24	U11114	700	P	S	0	1													
25	U11115	700	P	S	0	1													
26	U11117	700	P	S	0	1													

Continued from page 2.

*NOTE: Photocopy this page before completing if you have more than 26 writers to list.

Form Approved OMB No. 158-S00004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY																																				
WCAT080014079										<table border="1"> <tr> <td>1</td> <td colspan="4">TIME</td> <td colspan="4"></td> </tr> <tr> <td>W</td> <td colspan="4">DUP</td> <td colspan="4">DUP</td> </tr> <tr> <td>1</td> <td colspan="4">15 00 10 33</td> <td colspan="4">20</td> </tr> </table>										1	TIME								W	DUP				DUP				1	15 00 10 33				20			
1	TIME																																													
W	DUP				DUP																																									
1	15 00 10 33				20																																									

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U 0 6 2	900	p	S 0 1	
2	U 0 6 3	900	p	S 0 1	
3	U 0 6 4	900	p	S 0 1	
4	U 0 6 6	900	p	S 0 1	
5	U 0 6 7	900	p	S 0 1	
6	U 0 6 8	900	p	S 0 1	
7	U 0 6 9	750	p	S 0 1	
8	U 0 7 0	750	p	S 0 1	
9	U 0 7 1	750	p	S 0 1	
10	U 0 7 2	750	p	S 0 1	
1	U 0 7 3	900	p	S 0 1	
2	U 0 7 4	150	p	S 0 1	
13	U 0 7 5	900	p	S 0 1	
14	U 0 7 6	900	p	S 0 1	
15	U 0 7 7	250	p	S 0 1	
16	U 0 7 8	700	p	S 0 1	
17	U 0 7 9	600	p	S 0 1	
18	U 0 8 0	500	p	S 0 1	
19	U 0 8 1	550	p	S 0 1	
20	U 0 8 2	650	p	S 0 1	
21	U 0 8 3	850	p	S 0 1	
22	U 0 8 4	850	p	S 0 1	
23	U 0 8 5	900	p	S 0 1	
24	U 0 8 6	770	p	S 0 1	
25	U 0 8 7	770	p	S 0 1	
26	U 0 8 8	770	p	S 0 1	

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)						FOR OFFICIAL USE ONLY									
STATE															
COUNTY						WV		DUP		DUP					
DESCRIPTION OF HAZARDOUS WASTES (continued)															
LINE NO.	A. EPA HAZARD. WASTE ID (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
1	U1117	700	P	S	O	I									
2	U1118	700	P	S	O	I									
3	U1119	900	P	S	O	I									
4	U1120	900	P	S	O	I									
5	U1121	900	P	S	O	I									
6	U1122	2100	P	S	O	I									
7	U1123	250	P	S	O	I									
8	U1124	250	P	S	O	I									
9	U1125	700	P	S	O	I									
10	U1126	900	P	S	O	I									
11	U1127	900	P	S	O	I									
12	U1128	900	P	S	O	I									
13	U1129	250	P	S	O	I									
14	U1130	750	P	S	O	I									
15	U1131	300	P	S	O	I									
16	U1132	700	P	S	O	I									
17	U1133	900	P	S	O	I									
18	U1134	300	P	S	O	I									
19	U1135	250	P	S	O	I									
20	U1136	250	P	S	O	I									
21	U1137	900	P	S	O	I									
22	U1138	700	P	S	O	I									
23	U1139	700	P	S	O	I									
24	U1140	900	P	S	O	I									
25	U1141	700	P	S	O	I									
26	U1142	700	P	S	O	I									

Continued from page 2.

NOTE: Photocopy this page before completion if you have more than 25 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)				FOR OFFICIAL USE ONLY			
WIC: A T 0 8 1 0 0 1 4 1 0 7 9				W DUP			
DESCRIPTION OF HAZARDOUS WASTES (continued)				D. PROCESSES			
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)		2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
				1	2		
1	U 1 1 4 3	900	P	S	0 1		
2	U 1 1 4 4	900	P	S	0 1		
3	U 1 1 4 5	400	P	S	0 1		
4	U 1 1 4 6	1400	P	S	0 1		
5	U 1 1 4 7	750	P	S	0 1		
6	U 1 1 4 8	800	P	S	0 1		
7	U 1 1 4 9	900	P	S	0 1		
8	U 1 1 5 0	900	P	S	0 1		
9	U 1 1 5 1	900	P	S	0 1		
10	U 1 1 5 2	900	P	S	0 1		
11	U 1 1 5 3	900	P	S	0 1		
12	U 1 1 5 4	1600	P	S	0 1		
13	U 1 1 5 5	750	P	S	0 1		
14	U 1 1 5 6	900	P	S	0 1		
15	U 1 1 5 7	900	P	S	0 1		
16	U 1 1 5 8	900	P	S	0 1		
17	U 1 1 5 9	900	P	S	0 1		
18	U 1 1 6 0	700	P	S	0 1		
19	U 1 1 6 1	700	P	S	0 1		
20	U 1 1 6 2	900	P	S	0 1		
21	U 1 1 6 3	850	P	S	0 1		
22	U 1 1 6 4	750	P	S	0 1		
23	U 1 1 6 5	900	P	S	0 1		
24	U 1 1 6 6	600	P	S	0 1		
25	U 1 1 6 7	900	P	S	0 1		
26	U 1 1 6 8	700	P	S	0 1		

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)				FOR OFFICIAL USE ONLY			
CAETC 0610014079				W DUP			
DESCRIPTION OF HAZARDOUS WASTES (continued)				D. PROCESSES			
LINE NO.	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)		2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
				19	20	21	22
1	U169	250	P	S	0	1	
2	U170	250	P	S	0	1	
3	U171	250	P	S	0	1	
4	U172	900	P	S	0	1	
5	U173	700	P	S	0	1	
6	U174	300	P	S	0	1	
7	U176	950	P	S	0	1	
8	U177	700	P	S	0	1	
9	U178	750	P	S	0	1	
10	U179	900	P	S	0	1	
11	U180	300	P	S	0	1	
12	U181	900	P	S	0	1	
13	U182	900	P	S	0	1	
14	U183	900	P	S	0	1	
15	U184	350	P	S	0	1	
16	U185	750	P	S	0	1	
17	U186	500	P	S	0	1	
18	U187	800	P	S	0	1	
19	U188	2100	P	S	0	1	
20	U189	750	P	S	0	1	
21	U190	900	P	S	0	1	
22	U191	900	P	S	0	1	
23	U192	300	P	S	0	1	
24	U193	750	P	S	0	1	
25	U194	900	P	S	0	1	
26	U195	250	P	S	0	1	

Continued from page 2.

NOTE: Photocopy this page before completion if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WASTE NO. (enter code)										PROCESS CODES (enter)									
DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
A. EPA HAZARD. WASTE NO. (enter code)										B. ESTIMATED ANNUAL QUANTITY OF WASTE									
C. UNIT OF MEASURE (enter code)										1. PROCESS CODES (enter)									
2. PROCESS DESCRIPTION (if a code is not entered in D(1))																			
1	U	1	9	7						950		P	S	0	1				
2	U	2	0	0						750		P	S	0	1				
3	U	2	0	1						900		P	S	0	1				
4	U	2	0	2						900		P	S	0	1				
5	U	2	0	3						750		P	S	0	1				
6	U	2	0	4						700		P	S	0	1				
7	U	2	0	5						700		P	S	0	1				
8	U	2	0	6						900		P	S	0	1				
9	U	2	0	7						900		P	S	0	1				
10	U	2	0	8						900		P	S	0	1				
11	U	2	0	9						900		P	S	0	1				
12	U	2	1	0						700		P	S	0	1				
13	U	2	1	1						700		P	S	0	1				
14	U	2	1	3						700		P	S	0	1				
15	U	2	1	4						750		P	S	0	1				
16	U	2	1	5						900		P	S	0	1				
17	U	2	1	6						700		P	S	0	1				
18	U	2	1	7						700		P	S	0	1				
19	U	2	1	8						900		P	S	0	1				
20	U	2	1	9						900		P	S	0	1				
21	U	2	2	0						2100		P	S	0	1				
22	U	2	2	1						700		P	S	0	1				
23	U	2	2	2						800		P	S	0	1				
24	U	2	2	3						900		P	S	0	1				
25	U	2	2	5						700		P	S	0	1				
26	U	2	2	6						1600		P	S	0	1				

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-580004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WICAT 018100141079										W DUP 2 DUP									
V. DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
NO.	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
				1	2	3	4	5	6	7	8	9	10						
1	U227	950	P	S	0	1													
2	U228	900	P	S	0	1													
3	U234	700	P	S	0	1													
4	U235	900	P	S	0	1													
5	U236	900	P	S	0	1													
6	U237	700	P	S	0	1													
7	U238	750	P	S	0	1													
8	U239	1600	P	S	0	1													
9	U240	700	P	S	0	1													
10	U242	900	P	S	0	1													
11	U243	900	P	S	0	1													
12	U246	700	P	S	0	1													
13	U247	700	P	S	0	1													
14	U248	900	P	S	0	1													
15	U249	900	P	S	0	1													
16	U328	900	P	S	0	1													
17	U353	900	P	S	0	1													
18	U244	900	P	S	0	1													
19	U359	900	P	S	0	1													
20	D018	500	T	S	0	1	T	0	4										
21	D019	750	T	S	0	1	T	0	4										
22	D020	750	T	S	0	1	T	0	4										
23	D021	750	T	S	0	1	T	0	4										
24	D022	750	T	S	0	1	T	0	4										
25	D023	750	T	S	0	1	T	0	4										
26	D024	750	T	S	0	1	T	0	4										

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 15B-S80004

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY			
WC: 000014079		WI		DUP	
				DUP	

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D1)
1	D 0 2 5	750	T	S 0 1 T 0 4	
2	D 0 2 6	750	T	S 0 1 T 0 4	
3	D 0 2 7	750	T	S 0 1 T 0 4	
4	D 0 2 8	750	T	S 0 1 T 0 4	
5	D 0 2 9	750	T	S 0 1 T 0 4	
6	D 0 3 0	750	T	S 0 1 T 0 4	
7	D 0 3 1	750	T	S 0 1 T 0 4	
8	D 0 3 2	750	T	S 0 1 T 0 4	
9	D 0 3 3	750	T	S 0 1 T 0 4	
10	D 0 3 4	750	T	S 0 1 T 0 4	
11	D 0 3 5	750	T	S 0 1 T 0 4	
12	D 0 3 6	750	T	S 0 1 T 0 4	
13	D 0 3 7	750	T	S 0 1 T 0 4	
14	D 0 3 8	750	T	S 0 1 T 0 4	
15	D 0 3 9	750	T	S 0 1 T 0 4	
16	D 0 4 0	750	T	S 0 1 T 0 4	
17	D 0 4 1	750	T	S 0 1 T 0 4	
18	D 0 4 2	750	T	S 0 1 T 0 4	
19	D 0 4 3	750	T	S 0 1 T 0 4	
20	7 1 1	5000	P	S 0 1	
21	7 2 1	5000	P	S 0 1	
22	7 2 2	5000	P	S 0 1	
23	7 2 3	5000	P	S 0 1	
24	7 2 4	5000	P	S 0 1	
25	7 2 5	5000	P	S 0 1	
26	7 2 6	5000	P	S 0 1	

Continued from page 1.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)			FOR OFFICIAL USE ONLY		
W.C.A.T.O. 8.0.0.1 4 0.7 9			W	DUP	
V. DESCRIPTION OF HAZARDOUS WASTES (continued)					
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	7 2 7	5000	P	S 0 1	
2	7 2 8	5000	P	S 0 1	
3	7 3 1	5000	P	S 0 1	
4	7 4 1	5000	P	S 0 1	
5	7 5 1	5000	P	S 0 1	
6	7 9 1	5000	P	S 0 1	
7	7 9 2	5000	P	S 0 1	
8	8 0 1	5000	P	S 0 1	
9	1 1 2 1	5000	P	S 0 1	
10	1 1 2 2	5000	P	S 0 1	
11	1 2 3	5000	P	S 0 1	
12	1 3 1	5000	P	S 0 1	
13	1 3 2	5000	P	S 0 1	
14	1 3 3	5000	P	S 0 1	
15	1 3 4	5000	P	S 0 1	
16	1 3 5	5000	P	S 0 1	
17	1 4 1	5000	P	S 0 1	
18	1 5 1	5000	P	S 0 1	
19	1 6 1	5000	P	S 0 1	
20	1 6 2	5000	P	S 0 1	
21	1 7 1	5000	P	S 0 1	
22	1 7 2	5000	P	S 0 1	
23	1 8 1	5000	P	S 0 1	
24	2 1 1	5000	P	S 0 1	T 0 4
25	2 1 2	5000	P	S 0 1	
26	2 1 3	5000	P	S 0 1	

Continued from page 1.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)				FOR OFFICIAL USE ONLY				
WICIAIT 03001401719				WI DUP				
DESCRIPTION OF HAZARDOUS WASTES (continued)				D. PROCESSES				
J 2 2	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D1)
				17	18	19	20	
1	2114	5000	P	S	0	1		
2	221	10000	P	S	0	1	T	0 4
3	2122	5000	P	S	0	1	T	0 4
4	2123	5000	P	S	0	1	T	0 4
5	231	5000	P	S	0	1		
6	2132	5000	P	S	0	1		
7	241	5000	P	S	0	1		
8	251	5000	P	S	0	1		
9	21512	5000	P	S	0	1		
10	2611	5000	P	S	0	1		
11	2711	5000	P	S	0	1		
12	2172	5000	P	S	0	1		
13	2181	5000	P	S	0	1		
14	21911	5000	P	S	0	1		
15	3111	5000	P	S	0	1		
16	3121	5000	P	S	0	1		
17	31212	5000	P	S	0	1		
18	31311	5000	P	S	0	1	T	0 4
19	31411	5000	P	S	0	1	T	0 4
20	31412	5000	P	S	0	1	T	0 4
21	31413	5000	P	S	0	1	T	0 4
22	3151	5000	P	S	0	1		
23	31512	5000	P	S	0	1		
24	4111	5000	P	S	0	1		
25	4121	5000	P	S	0	1		
26	411	5000	P	S	0	1		

Continues from page 2.

NOTE: Photocopy this page before completing if you have more than 25 wastes to list.

Form Approved OMB No. 1605-0004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W C A T 0 1 8 1 0 1 1 4 0 7 9										W DUP 2 DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
A. EPA HAZARD. WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE		C. UNIT OF MEASURE (enter code)		D. PROCESSES													
						1. PROCESS CODES (enter)													
						2. PROCESS DESCRIPTION (if a code is not entered in D(1))													
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
1	4	1	1	5000	P	S	0	1											
2	4	5	1	5000	P	S	0	1											
3	4	6	1	5000	P	S	0	1											
4	4	7	1	5000	P	S	0	1											
5	4	8	1	5000	P	S	0	1											
6	4	9	1	5000	P	S	0	1											
7	5	1	1	5000	P	S	0	1											
8	5	1	2	5000	P	S	0	1											
9	5	1	3	5000	P	S	0	1											
10	5	2	1	5000	P	S	0	1											
11	5	3	1	5000	P	S	0	1											
12	5	4	1	5000	P	S	0	1											
13	5	5	1	10000	P	S	0	1	T	0	4								
14	5	6	1	5000	P	S	0	1	T	0	4								
15	5	7	1	5000	P	S	0	1											
16	5	8	1	5000	P	S	0	1											
17	5	9	1	5000	P	S	0	1											
18	6	1	1	5000	P	S	0	1											
19	6	1	2	5000	P	S	0	1											
20	6	1	3	5000	P	S	0	1											
21	F	0	3	7	10000	P	S	0	1	T	0	4							
22	F	0	3	8	10000	P	S	0	1	T	0	4							
23	F	0	3	9	5000	P	S	0	1	T	0	4							
24	K	1	0	7	1000	P	S	0	1										
25	K	1	0	8	1000	P	S	0	1										
26	K	1	0	9	1000	P	S	0	1										

Form Approved OMB No. 1545-0047

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

D. PROCEDURES

EPA Form 3510-3 (6-80)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA ID Number (Enter from page 1)

Secondary Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES	
				(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	P 1 9 6			S 0 1	
2	P 1 9 7			S 0 1	
3	P 1 9 8			S 0 1	
4	P 1 9 9			S 0 1	
5	P 2 0 1			S 0 1	
6	P 2 0 2			S 0 1	
7	P 2 0 3			S 0 1	
8	P 2 0 4			S 0 1	
9	P 2 0 5			S 0 1	
10	U 2 7 1			S 0 1	
11	U 2 7 7			S 0 1	
12	U 2 7 8			S 0 1	
13	U 2 7 9			S 0 1	
14	U 2 8 0			S 0 1	
15	U 3 6 4			S 0 1	
16	U 3 6 5			S 0 1	
17	U 3 6 6			S 0 1	
18	U 3 6 7			S 0 1	
19	U 3 7 2			S 0 1	
20	U 3 7 3			S 0 1	
21	U 3 7 5			S 0 1	
22	U 3 7 6			S 0 1	
23	U 3 7 7			S 0 1	
24	U 3 7 8			S 0 1	
25	U 3 7 9			S 0 1	
26	U 3 8 1			S 0 1	
27	U 3 8 2			S 0 1	
28	U 3 8 3			S 0 1	
29	U 3 8 4			S 0 1	
30	U 3 8 5			S 0 1	
31	U 3 8 6			S 0 1	
32	U 3 8 7			S 0 1	
33	U 3 8 9			S 0 1	

EPA ID Number (Enter from page 1)

Secondary Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES	
				(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U 3 9 0			S 0 1	
2	U 3 9 1			S 0 1	
3	U 3 9 2			S 0 1	
4	U 3 9 3			S 0 1	
5	U 3 9 4			S 0 1	
6	U 3 9 5			S 0 1	
7	U 3 9 6			S 0 1	
8	U 4 0 0			S 0 1	
9	U 4 0 1			S 0 1	
10	U 4 0 2			S 0 1	
11	U 4 0 3			S 0 1	
12	U 4 0 4			S 0 1	
13	U 4 0 7			S 0 1	
14	U 4 0 9			S 0 1	
15	U 4 1 0			S 0 1	
16	U 4 1 1			S 0 1	
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

Date Signed

Name and Official Title (Type or print)

Owner Signature

Date Signed

Name and Official Title (Type or print)

Operator Signature

Date Signed

Name and Official Title (Type or print)

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)



RECEIVED

95 MAY 30 AM 11:06

3 GOLD MINE ROAD, FLANDERS, NEW JERSEY 07836 201-345-7111

May 23, 1995

Mr. Salvatore Ciriello
Permitting Branch Chief
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 300
Berkeley, California 94710



RE: **California Advanced Environmental Technology Corporation**
CAT080014079

Dear Mr. Ciriello:

This letter will serve as a formal request by California Advanced Environmental Technology Corporation (CAETC) for approval by the California Environmental Protection Agency to transfer the ownership and operational control of the hazardous waste facility permit maintained by CAETC at its Richmond location to a new corporation. The new owner and operator will be Advanced Environmental Technical Services, L.L.C. (AETS), incorporated in Delaware. This request is being submitted in accordance with the California Code of Regulations, Title 22 Section 66270.40.

This transfer is the result of an agreement between CAETC and Chemical Waste Management, Inc. (CWM). CAETC and CWM have agreed to form a joint venture called Advanced Environmental Technical Services. AETS will own and operate RCRA facilities throughout the United States. AETC, a sister company of CAETC, will own 40% of the new entity, and CWM will own 60%.

In accordance with the California Code of Regulations, a revised hazardous waste facility Part A permit application which reflects the changes in owner and operator is enclosed. It is the understanding of CAETC that a disclosure statement will be required for the new corporation. CAETC is requesting approval to provide a revised disclosure statement upon approval of the transfer. This request is based on the fact that CAETC has completed a disclosure statement in accordance with the California Code of Regulations,

Mr. Salvatore Ciriello

May 23, 1995

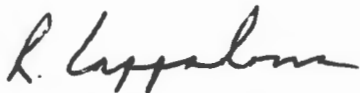
Page - 2 -

Title 22 Section 25112.5, and CWM is a subsidiary of WMX Technologies of Oak Brook, Illinois, a publicly held corporation which is traded on the New York Stock Exchange.

AETS will meet the financial requirements of Title 22 Chapter 14 Article 8 within six months of the date of the change of ownership and operational control which is planned for January 1, 1996. CAETC will maintain these financial instruments until similar AETS instruments are in place.

CAETC would greatly appreciate your prompt review of this request for permit transfer. If your review reveals any questions or areas of concern, please contact me at (201) 691-7373.

Sincerely,




Robert E. Cappadona
Director, Regulatory Affairs

REC:cmt

Enclosure

cc: James T. Bell, AETC

For EPA Regional Use Only		<div style="text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 Hazardous Waste Permit Application Part A (Read the Instructions before starting)</div>			
Date Received Month Day Year					
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)					
<input type="checkbox"/> A. First Part A Submission			<input checked="" type="checkbox"/> B. Part A Amendment #		
C. Installation's EPA ID Number			D. Secondary ID Number (If applicable)		
C A T 0 8 0 0 1 4 0 7 9					
II. Name of Facility					
Advanced Environmental Technical Services					
III. Facility Location (Physical address not P.O. Box or Route Number)					
A. Street					
1 1 2 5 H e n s l e y S t r e e t					
Street (Continued)					
City or Town				State	Zip Code
R i c h m o n d				C A	9 4 8 0 4 -
County Code (If known)	County Name				
	C o n t r a C o s t a				
B. Land Type (Enter code)	C. Geographic Location				D. Facility Existence Date
	LATITUDE (Degrees, Minutes, & Seconds)		LONGITUDE (Degrees, Minutes & Seconds)		Month Day Year
	3 7 5 6 0 5 6		1 2 2 2 1 0 4 9		0 7 0 1 1 9 8 3
IV. Facility Mailing Address					
Street or P.O. Box					
S a m e					
City or Town				State	Zip Code
					-
V. Facility Contact (Person to be contacted regarding waste activities at facility)					
Name (Last)			(First)		
L e e s			D o n a l d		
Job Title			Phone Number (Area Code and Number)		
V.P. Western Region			5 1 0 - 7 8 2 - 7 0 0 0		
VI. Facility Contact Address (See instructions)					
A. Contact Address Location Mailing Other		B. Street or P.O. Box			
<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		1 9 4 1 0 C a b o t B o u l e v a r d			
City or Town				State	Zip Code
H a y w a r d				C A	9 4 5 4 5 -

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

VII. Operator Information (See instructions)

Name of Operator

Advanced Environmental Technical Services

Street or P.O. Box

1 1 2 5 H e n s l e y S t r e e t

City or Town

State

ZIP Code

R i c h m o n d

C A

9 4 8 0 4 -

Phone Number (Area Code and Number)

5 1 0 - 2 3 3 - 8 0 0 1

B. Operator Type

P

C. Change of Operator

Indicator

Yes

X

No

Date Changed

Month

Day

Year

0

1

0

1

9

6

VIII. Facility Owner (See instructions)

A. Name of Facility's Legal Owner

Advanced Environmental Technical Services

Street or P.O. Box

3 G o l d M i n e R o a d

City or Town

State

ZIP Code

F l a n d e r s

N J

0 7 8 3 6 -

Phone Number (Area Code and Number)

2 0 1 - 3 4 7 - 7 1 1 1

B. Owner Type

P

C. Change of Owner

Indicator

Yes

X

No

Date Changed

Month

Day

Year

0

1

0

1

9

6

IX. SIC Codes (4-digit, in order of significance)

Primary

Secondary

8 9 9 9 (Description)
Services, N.E.C.

(Description)

Secondary

Secondary

(Description)

(Description)

X. Other Environmental Permits (See instructions)

A. Permit Type
(Enter code)

B. Permit Number

C. Description

R

C A T 0 8 0 0 1 4 0 7 9

RCRA Part B Permit

E

2 0 7 S 0 0 3 9 9 4

Stormwater Discharge

E

F P 0 0 5 4 1

Fire Dept. Hazardous Mat. Storage

E

N A

POTW Discharge City of Richmond

E

C U 9 2 - 4 9

Conditional Use Permit

E

1 3 4 3 5

Auth. to Construct BAQMD

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

XI. Nature of Business (Provide a brief description)

Hazardous Waste transfer and storage facility
In addition, AETS will bulk petroleum hydrocarbon - contaminated soil and debris, household hazardous waste, materials with economic value destined for recycling and a drum crusher on site.

XII. Process Codes and Design Capacities

A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XII.

B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.

1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Disposal:					
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
D80	Landfill	Acre-feet or Hectare-meter	T88	Titanium Dioxide Chloride Process Oxidation Reactor	
D81	Land Treatment	Acres or Hectares	T89	Methane Reforming Furnace	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T90	Pulping Liquor Recovery Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
D89	Other Disposal	Any Unit of Measure Listed Below	T92	Halogen Acid Furnaces	
			T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
Storage:			T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters	Miscellaneous (Subpart X):		
S02	Tank	Gallons or Liters	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
S03	Waste Pile	Cubic Yards or Cubic Meters	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
S04	Surface Impoundment	Gallons or Liters			Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
S05	Drip Pad	Gallons or Liters	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
S06	Containment Building-Storage	Cubic Yards or Cubic Meters			Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below	X04	Geologic Repository	Any Unit of Measure Listed Below
Treatment:			X99	Other Subpart X	Any Unit of Measure Listed Below
T01	Tank	Gallons Per Day or Liters Per Day			
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boller	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
				Btu's Per Hour	I

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

C A T 0 8 0 0 1 4 0 7 9

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only
		1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	S 0 2	5 3 3 . 7 8 8	G	0 0 1	
1	S 0 1	6 1.6 0 0	G		
2	T 0 4	. 6 0	Y		
3		.			
4		.			
5		.			
6		.			
7		.			
8		.			
9		.			
1 0		.			
1 1		.			
1 2		.			
1 3		.			

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter as in seg w/XII)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
		1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	T 0 4				In-situ Vitrification
1	T 0 4	6 0	Y	001	Consolidation of Petroleum Contaminated Soils
2					
3					
4					

[illegible]

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WICAT018001140791										W DUP 2 DUP									

7. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 0 1	375	T	S 0 1	
2	D 0 0 2	250	T	S 0 1	
3	D 0 0 3	13	T	S 0 1	
4	D 0 0 4	6	T	S 0 1	
5	D 0 0 5	6	T	S 0 1	
6	D 0 0 6	6	T	S 0 1	
7	D 0 0 7	6	T	S 0 1	
8	D 0 0 8	6	T	S 0 1	
9	D 0 0 9	6	T	S 0 1	
10	D 0 1 0	250	T	S 0 1	
11	D 0 1 1	250	P	S 0 1	
12	D 0 1 2	250	P	S 0 1	
13	D 0 1 3	250	P	S 0 1	
14	D 0 1 4	250	P	S 0 1	
15	D 0 1 5	250	P	S 0 1	
16	D 0 1 6	250	P	S 0 1	
17	D 0 1 7	250	P	S 0 1	
18	F 0 0 1	50	T	S 0 1	
19	F 0 0 2	75	T	S 0 1	
20	F 0 0 3	250	T	S 0 1	
21	F 0 0 4	5	T	S 0 1	
22	F 0 0 5	50	T	S 0 1	
23	F 0 0 6	25	T	S 0 1	
	F 0 0 7	2500	P	S 0 1	
25	F 0 0 8	2500	P	S 0 1	

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W C A T 0 8 0 0 1 4 0 7 9										W DUP									

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F 0 1 0	700	P	S 0 1	
2	F 0 1 1	850	P	S 0 1	
3	F 0 1 2	900	P	S 0 1	
4	F 0 1 9	900	P	S 0 1	
5	F 0 2 0	500	P	S 0 1	
6	F 0 2 1	400	P	S 0 1	
7	F 0 2 2	500	P	S 0 1	
8	F 0 2 3	600	P	S 0 1	
9	F 0 2 4	700	P	S 0 1	
10	F 0 2 6	900	P	S 0 1	
	F 0 2 7	900	P	S 0 1	
12	F 0 2 8	900	P	S 0 1	
13	K 0 0 1	1500	P	S 0 1	
14	K 0 0 2	900	P	S 0 1	
15	K 0 0 3	1400	P	S 0 1	
16	K 0 0 4	900	P	S 0 1	
17	K 0 0 5	900	P	S 0 1	
18	K 0 0 6	900	P	S 0 1	
19	K 0 0 7	1400	P	S 0 1	
20	K 0 0 8	900	P	S 0 1	
21	K 0 0 9	550	P	S 0 1	
22	K 0 1 0	900	P	S 0 1	
23	K 0 1 1	1400	P	S 0 1	
	K 0 1 3	900	P	S 0 1	
25	K 0 1 4	750	P	S 0 1	

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W C A T 0 8 0 0 1 4 0 7 9 1										W D U P 2 D U P									

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

D. PROCESSES

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
				17	18	19	20	21	22	23	24		
1	K 1 0 6	900	P	S	0	1							
2	K 1 1 1	900	P	S	0	1							
3	K 1 1 2	750	P	S	0	1							
4	K 1 1 3	850	P	S	0	1							
5	K 1 1 4	700	P	S	0	1							
6	K 1 1 5	750	P	S	0	1							
7	K 1 1 6	900	P	S	0	1							
8	K 1 1 7	350	P	S	0	1							
9	K 1 1 8	850	P	S	0	1							
10	K 1 3 6	600	P	S	0	1							
11	K 0 3 1	800	P	S	0	1							
12	K 0 3 2	350	P	S	0	1							
13	K 0 3 3	900	P	S	0	1							
14	K 0 3 4	900	P	S	0	1							
15	K 0 9 7	900	P	S	0	1							
16	K 0 3 5	900	P	S	0	1							
17	K 0 3 6	850	P	S	0	1							
18	K 0 3 7	800	P	S	0	1							
19	K 0 3 8	900	P	S	0	1							
20	K 0 3 9	700	P	S	0	1							
21	K 0 4 0	700	P	S	0	1							
22	K 0 4 1	700	P	S	0	1							
23	K 0 9 8	350	P	S	0	1							
24	K 0 4 2	350	P	S	0	1							
25	K 0 4 3	600	P	S	0	1							
26	K 0 9 9	300	P	S	0	1							

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W C A T 0 8 0 0 1 4 0 7 9 1										W DUP 2 DUP									

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	K 0 4 4	750	P	S 0 1	
2	K 0 4 5	750	P	S 0 1	
3	K 0 4 6	900	P	S 0 1	
4	K 0 4 7	900	P	S 0 1	
5	K 0 4 8	500	P	S 0 1	
6	K 0 4 9	500	P	S 0 1	
7	K 0 5 0	750	P	S 0 1	
8	K 0 5 1	350	P	S 0 1	
9	K 0 5 2	500	K P	S 0 1	
10	P 0 1 7	225	P	S 0 1	
11	P 0 1 8	900	P	S 0 1	
12	P 0 2 0	700	P	S 0 1	
13	P 0 2 1	600	P	S 0 1	
14	P 0 2 2	750	P	S 0 1	
15	P 0 2 3	350	P	S 0 1	
16	P 0 2 4	225	P	S 0 1	
17	P 0 2 6	750	P	S 0 1	
18	P 0 2 7	550	P	S 0 1	
19	P 0 2 8	350	P	S 0 1	
20	P 0 2 9	750	P	S 0 1	
21	P 0 3 0	2100	P	S 0 1	
22	P 0 3 1	1200	P	S 0 1	
23	P 0 3 3	700	P	S 0 1	
24	P 0 3 6	900	P	S 0 1	
25	P 0 3 7	225	P	S 0 1	
26	P 0 3 8	225	P	S 0 1	

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
W	C 0 8 0 0 1 4 0 7 9	W	DUP
13 14 15		13 14 15 16 17 18	

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P 0 3 9	900	P	S 0 1	
2	P 0 4 0	950	P	S 0 1	
3	P 0 4 1	900	P	S 0 1	
4	P 0 4 2	700	P	S 0 1	
5	P 0 4 3	250	P	S 0 1	
6	P 0 4 4	900	P	S 0 1	
7	P 0 4 5	750	P	S 0 1	
8	P 0 4 6	900	P	S 0 1	
9	P 0 4 7	800	P	S 0 1	
10	K 0 6 1	700	P	S 0 1	
	K 0 6 2	350	P	S 0 1	
11	K 0 6 9	900	P	S 0 1	
13	K 1 0 0	900	P	S 0 1	
14	K 0 8 4	900	P	S 0 1	
15	K 1 0 1	350	P	S 0 1	
16	K 1 0 2	900	P	S 0 1	
17	K 0 8 6	700	P	S 0 1	
18	K 0 6 0	900	P	S 0 1	
19	K 0 8 7	700	P	S 0 1	
20	P 0 0 1	900	P	S 0 1	
21	P 0 0 2	500	P	S 0 1	
22	P 0 0 3	750	P	S 0 1	
23	P 0 0 4	225	P	S 0 1	
24	P 0 0 5	225	P	S 0 1	
25	P 0 0 6	750	P	S 0 1	

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
T/M/C										T/M/C									
WICAT 0 81 01 01 1: 41 01 71 91										WICAT 0 81 01 01 1: 41 01 71 91									
1 2 3 4 5 6 7 8 9 10										1 2 3 4 5 6 7 8 9 10									

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P 0 0 8	900	P	S 0 1		
2	P 0 0 9	850	P	S 0 1		
3	P 0 1 0	225	P	S 0 1		
4	P 0 1 1	225	P	S 0 1		
5	P 0 1 2	225	P	S 0 1		
6	P 0 1 3	1400	P	S 0 1		
7	P 0 1 4	225	P	S 0 1		
8	P 0 1 5	2000	P	S 0 1		
9	P 0 1 6	225	P	S 0 1		
10	P 0 4 8	225	P	S 0 1		
11	P 0 4 9	900	P	S 0 1		
12	P 0 5 0	900	P	S 0 1		
13	P 0 5 1	1200	P	S 0 1		
14	P 0 5 4	750	P	S 0 1		
15	P 0 5 6	700	P	S 0 1		
16	P 0 5 7	600	P	S 0 1		
17	P 0 5 8	850	P	S 0 1		
18	P 0 5 9	900	P	S 0 1		
19	P 0 6 0	900	P	S 0 1		
20	P 0 6 2	900	P	S 0 1		
21	P 0 6 4	225	P	S 0 1		
22	P 0 6 5	800	P	S 0 1		
23	P 0 6 6	800	P	S 0 1		
24	P 0 6 7	450	P	S 0 1		
25	P 0 6 8	225	P	S 0 1		

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY																																																																		
<table border="1"> <tr> <td>S</td> <td colspan="8">TAC</td> </tr> <tr> <td>W</td> <td>C</td> <td>A</td> <td>T</td> <td>C</td> <td>3</td> <td>0</td> <td>0</td> <td>2</td> <td>4</td> <td>0</td> <td>7</td> <td>9</td> <td>I</td> </tr> </table>										S	TAC								W	C	A	T	C	3	0	0	2	4	0	7	9	I	<table border="1"> <tr> <td>S</td> <td colspan="8">TAC</td> </tr> <tr> <td>W</td> <td colspan="8">DUP</td> <td>C</td> <td colspan="2">DUP</td> </tr> <tr> <td>1</td> <td>2</td> <td colspan="6"></td> <td>13</td> <td>14</td> <td>15</td> <td>23</td> <td>24</td> </tr> </table>										S	TAC								W	DUP								C	DUP		1	2							13	14	15	23	24
S	TAC																																																																											
W	C	A	T	C	3	0	0	2	4	0	7	9	I																																																															
S	TAC																																																																											
W	DUP								C	DUP																																																																		
1	2							13	14	15	23	24																																																																

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
1	P11013	800	P	S	0	1							
2	P11014	900	P	S	0	1							
3	P11015	900	P	S	0	1							
4	P11016	800	P	S	0	1							
5	P11017	850	P	S	0	1							
6	P11018	900	P	S	0	1							
7	P11019	700	P	S	0	1							
8	P1110	700	P	S	0	1							
9	P11111	600	P	S	0	1							
10	P11112	750	P	S	0	1							
11	P11113	850	P	S	0	1							
12	P11114	750	P	S	0	1							
13	P11115	900	P	S	0	1							
14	P11116	700	P	S	0	1							
15	p11113	900	P	S	0	1							
16	p11119	900	P	S	0	1							
17	P11210	900	P	S	0	1							
18	P11211	950	P	S	0	1							
19	P11212	225	P	S	0	1							
20	P11213	900	P	S	0	1							
21	U10101	300	P	S	0	1							
22	U10102	1000	P	S	0	1							
23	U101013	300	P	S	0	1							
24	U101014	900	P	S	0	1							
25	U101015	700	P	S	0	1							

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EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY									
1	2	3	4	5	6	7	8	9	10	11	12
W	1	C	1	2	3	0	1	0	1	4	0
1	7	9	1	1	1	1	1	1	1	1	1
<div style="display: flex; justify-content: space-between;"> <div> <div>W</div> <div>DUP</div> </div> <div> <div>DUP</div> </div> </div>											

[illegible]

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
U 01031401140179										W DUP DUP									

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U 010314	800	P	S 0 1	
2	U 010315	850	P	S 0 1	
3	U 010316	500	P	S 0 1	
4	U 010317	900	P	S 0 1	
5	U 010318	750	P	S 0 1	
6	U 010319	850	P	S 0 1	
7	U 010411	950	P	S 0 1	
8	U 010412	900	P	S 0 1	
9	U 010413	50	P	S 0 1	
10	U 010414	2000	P	S 0 1	
11	U 010415	900	P	S 0 1	
12	U 010416	900	P	S 0 1	
13	U 010417	500	P	S 0 1	
14	U 010418	800	P	S 0 1	
15	U 010419	900	P	S 0 1	
16	U 010501	900	P	S 0 1	
17	U 010511	1000	P	S 0 1	
18	U 010512	750	P	S 0 1	
19	U 010513	250	P	S 0 1	
20	U 010515	1600	P	S 0 1	
21	U 010516	250	P	S 0 1	
22	U 010517	900	P	S 0 1	
23	U 010518	900	P	S 0 1	
24	U 010519	700	P	S 0 1	
25	U 010601	750	P	S 0 1	

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
1	WICAT0810014079	1	WI DUP
2		2	DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U0819	250	P	S01	
2	U090	900	P	S01	
3	U091	1300	P	S01	
4	U092	900	P	S01	
5	U093	700	P	S01	
6	U094	900	P	S01	
7	U095	900	P	S01	
8	U096	700	P	S01	
9	U097	700	P	S01	
10	U098	250	P	S01	
11	U099	250	P	S01	
12	U101	750	P	S01	
13	U1101	250	P	S01	
14	U1103	250	P	S01	
15	U1105	900	P	S01	
16	U1106	250	P	S01	
17	U1107	900	P	S01	
18	U1108	900	P	S01	
19	U1109	900	P	S01	
20	U1110	700	P	S01	
21	U1111	700	P	S01	
22	U1112	750	P	S01	
23	U1113	250	P	S01	
24	U1114	700	P	S01	
25	U1115	700	P	S01	

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY			
WC A 7 0 8 0 0 1 4 0 7 9		WI		DUP	
3 1 4 7 1 5		1 1 2		1 3 1 4 1 5 2 3 2 4	

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U 0 6 2	900	p	S 0 1	
2	U 0 6 3	900	p	S 0 1	
3	U 0 6 4	900	p	S 0 1	
4	U 0 6 6	900	p	S 0 1	
5	U 0 6 7	900	p	S 0 1	
6	U 0 6 8	900	p	S 0 1	
7	U 0 6 9	750	p	S 0 1	
8	U 0 7 0	750	p	S 0 1	
9	U 0 7 1	750	p	S 0 1	
10	U 0 7 2	750	p	S 0 1	
1	U 0 7 3	900	p	S 0 1	
2	U 0 7 4	250	p	S 0 1	
13	U 0 7 5	900	p	S 0 1	
14	U 0 7 6	600	p	S 0 1	
15	U 0 7 7	250	p	S 0 1	
16	U 0 7 8	700	p	S 0 1	
17	U 0 7 9	600	p	S 0 1	
18	U 0 8 0	500	p	S 0 1	
19	U 0 8 1	350	p	S 0 1	
20	U 0 8 2	350	p	S 0 1	
21	U 0 8 3	350	p	S 0 1	
22	U 0 8 4	350	p	S 0 1	
23	U 0 8 5	900	p	S 0 1	
24	U 0 8 6	700	p	S 0 1	
25	U 0 8 7	750	p	S 0 1	

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
<div> <div>5</div> <div>11/1</div> <div>CLAT</div> <div>0</div> <div>8</div> <div>0</div> <div>0</div> <div>1</div> <div>4</div> <div>0</div> <div>7</div> <div>9</div> <div>1</div> </div>										<div> <div>5</div> <div>W</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> </div>									
<div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> </div>										<div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> </div>									

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES			
				1. PROCESS CODES (enter)			
				27	28	29	30
1	U1117	700	P	S	0	1	
2	U1118	700	P	S	0	1	
3	U1119	900	P	S	0	1	
4	U1120	900	P	S	0	1	
5	U1121	900	P	S	0	1	
6	U1122	2100	P	S	0	1	
7	U1123	250	P	S	0	1	
8	U1124	250	P	S	0	1	
9	U1125	700	P	S	0	1	
10	U1126	900	P	S	0	1	
11	U1127	900	P	S	0	1	
12	U1128	900	P	S	0	1	
13	U1129	250	P	S	0	1	
14	U1130	750	P	S	0	1	
15	U1131	500	P	S	0	1	
16	U1132	700	P	S	0	1	
17	U1133	900	P	S	0	1	
18	U1134	300	P	S	0	1	
19	U1135	250	P	S	0	1	
20	U1136	250	P	S	0	1	
21	U1137	900	P	S	0	1	
22	U1138	700	P	S	0	1	
23	U1139	700	P	S	0	1	
24	U1140	900	P	S	0	1	
25	U1141	700	P	S	0	1	

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EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
S	TAC	S	TAC
WICAT 0'810:0.1.4101719		W	DUP
1 2	13 14 15 22	24	

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
	1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
	22	23	24	25	26	27	28	29	30	31	32	33	34			
1	U	1	4	3	900	P	S	0	1							
2	U	1	4	4	900	P	S	0	1							
3	U	1	4	5	400	P	S	0	1							
4	U	1	4	6	1400	P	S	0	1							
5	U	1	4	7	750	P	S	0	1							
6	U	1	4	8	800	P	S	0	1							
7	U	1	4	9	900	P	S	0	1							
8	U	1	5	0	900	P	S	0	1							
9	U	1	5	1	900	P	S	0	1							
10	U	1	5	2	900	P	S	0	1							
11	U	1	5	3	900	P	S	0	1							
12	U	1	5	4	1600	P	S	0	1							
13	U	1	5	5	750	P	S	0	1							
14	U	1	5	6	900	P	S	0	1							
15	U	1	5	7	900	P	S	0	1							
16	U	1	5	8	900	P	S	0	1							
17	U	1	5	9	900	P	S	0	1							
18	U	1	6	0	700	P	S	0	1							
19	U	1	6	1	700	P	S	0	1							
20	U	1	6	2	900	P	S	0	1							
21	U	1	6	3	850	P	S	0	1							
22	U	1	6	4	750	P	S	0	1							
23	U	1	6	5	900	P	S	0	1							
24	U	1	6	6	600	P	S	0	1							
25	U	1	6	7	900	P	S	0	1							

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY																					
5 0A7060014017197										<table border="1"> <tr> <td colspan="2">S</td> <td colspan="2">T/C</td> </tr> <tr> <td colspan="2">WI</td> <td colspan="2">DUP</td> </tr> <tr> <td colspan="2">117</td> <td colspan="2">13 14 15 23</td> </tr> </table>										S		T/C		WI		DUP		117		13 14 15 23	
S		T/C																													
WI		DUP																													
117		13 14 15 23																													

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
	22	23	24	25	26	27	28	29	30	31	32	33	34		
1	U 1 6 9	250	P	S	0	1									
2	U 1 7 0	250	P	S	0	1									
3	U 1 7 1	250	P	S	0	1									
4	U 1 7 2	900	P	S	0	1									
5	U 1 7 3	700	P	S	0	1									
6	U 1 7 4	300	P	S	0	1									
7	U 1 7 6	950	P	S	0	1									
8	U 1 7 7	700	P	S	0	1									
9	U 1 7 8	750	P	S	0	1									
10	U 1 7 9	900	P	S	0	1									
11	U 1 8 0	300	P	S	0	1									
12	U 1 8 1	900	P	S	0	1									
13	U 1 8 2	900	P	S	0	1									
14	U 1 8 3	900	P	S	0	1									
15	U 1 8 4	350	P	S	0	1									
16	U 1 8 5	750	P	S	0	1									
17	U 1 8 6	500	P	S	0	1									
18	U 1 8 7	300	P	S	0	1									
19	U 1 8 8	2100	P	S	0	1									
20	U 1 8 9	750	P	S	0	1									
21	U 1 9 0	900	P	S	0	1									
22	U 1 9 1	900	P	S	0	1									
23	U 1 9 2	300	P	S	0	1									
24	U 1 9 3	750	P	S	0	1									
25	U 1 9 4	900	P	S	0	1									

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
TIA C										TIA C									
WC A T 1 3 0 0 0 1 1 4 0 7 9 1										W DUP 2 DUP									
1 2 3 14 18										1 2 3 14 18 23 28									

LINE NO.	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES								
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
1	U 1 9 7	950	P	S	0	1						
2	U 2 0 0	750	P	S	0	1						
3	U 2 0 1	900	P	S	0	1						
4	U 2 0 2	900	P	S	0	1						
5	U 2 0 3	750	P	S	0	1						
6	U 2 0 4	700	P	S	0	1						
7	U 2 0 5	700	P	S	0	1						
8	U 2 0 6	900	P	S	0	1						
9	U 2 0 7	900	P	S	0	1						
10	U 2 0 8	900	P	S	0	1						
11	U 2 0 9	900	P	S	0	1						
12	U 2 1 0	700	P	S	0	1						
13	U 2 1 1	700	P	S	0	1						
14	U 2 1 3	700	P	S	0	1						
15	U 2 1 4	750	P	S	0	1						
16	U 2 1 5	900	P	S	0	1						
17	U 2 1 6	700	P	S	0	1						
18	U 2 1 7	700	P	S	0	1						
19	U 2 1 8	900	P	S	0	1						
20	U 2 1 9	900	P	S	0	1						
21	U 2 2 0	2100	P	S	0	1						
22	U 2 2 1	700	P	S	0	1						
23	U 2 2 2	900	P	S	0	1						
24	U 2 2 3	900	P	S	0	1						
25	U 2 2 5	700	P	S	0	1						

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WICIA: 0-8101012-4101719										WI DUP									

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U 2 2 7	950	P	S 0 1	
2	U 2 2 8	900	P	S 0 1	
3	U 2 3 4	700	P	S 0 1	
4	U 2 3 5	900	P	S 0 1	
5	U 2 3 6	900	P	S 0 1	
6	U 2 3 7	700	P	S 0 1	
7	U 2 3 8	750	P	S 0 1	
8	U 2 3 9	1600	P	S 0 1	
9	U 2 4 0	700	P	S 0 1	
10	U 2 4 2	900	P	S 0 1	
11	U 2 4 3	900	P	S 0 1	
12	U 2 4 6	700	P	S 0 1	
13	U 2 4 7	700	P	S 0 1	
14	U 2 4 8	900	P	S 0 1	
15	U 2 4 9	900	P	S 0 1	
16	U 3 2 8	900	P	S 0 1	
17	U 3 5 3	900	P	S 0 1	
18	U 2 4 4	900	P	S 0 1	
19	U 3 5 9	900	P	S 0 1	
20	D 0 1 8	500	T	S 0 1 T 0 4	
21	D 0 1 9	750	T	S 0 1 T 0 4	
22	D 0 2 0	750	T	S 0 1 T 0 4	
23	D 0 2 1	750	T	S 0 1 T 0 4	
24	D 0 2 2	750	T	S 0 1 T 0 4	
25	D 0 2 3	750	T	S 0 1 T 0 4	

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
WCA 7 0 3 0 0 1 4 0 7 9		WI	DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

D. PROCESSES

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D1)
1	D 0 2 5	750	T	S 0 1 T 0 4	
2	D 0 2 6	750	T	S 0 1 T 0 4	
3	D 0 2 7	750	T	S 0 1 T 0 4	
4	D 0 2 8	750	T	S 0 1 T 0 4	
5	D 0 2 9	750	T	S 0 1 T 0 4	
6	D 0 3 0	750	T	S 0 1 T 0 4	
7	D 0 3 1	750	T	S 0 1 T 0 4	
8	D 0 3 2	750	T	S 0 1 T 0 4	
9	D 0 3 3	750	T	S 0 1 T 0 4	
10	D 0 3 4	750	T	S 0 1 T 0 4	
11	D 0 3 5	750	T	S 0 1 T 0 4	
12	D 0 3 6	750	T	S 0 1 T 0 4	
13	D 0 3 7	750	T	S 0 1 T 0 4	
14	D 0 3 8	750	T	S 0 1 T 0 4	
15	D 0 3 9	750	T	S 0 1 T 0 4	
16	D 0 4 0	750	T	S 0 1 T 0 4	
17	D 0 4 1	750	T	S 0 1 T 0 4	
18	D 0 4 2	750	T	S 0 1 T 0 4	
19	D 0 4 3	750	T	S 0 1 T 0 4	
20	7 1 1	5000	P	S 0 1	
21	7 2 1	5000	P	S 0 1	
22	7 2 2	5000	P	S 0 1	
23	7 2 3	5000	P	S 0 1	
24	7 2 4	5000	P	S 0 1	
25	7 2 5	5000	P	S 0 1	

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

SPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
W. CAT 03.00140.73		W. DUP	DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
	1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
1	7	2	7	5000	P	S	0	1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
WICANT 2300240719		W1 DUP	

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
	22	23	24	25	26	27	28	29	30	31	32	33	34		
1	2114	5000	P	S	0	1									
2	221	10000	P	S	0	1	T	0	4						
3	222	5000	P	S	0	1	T	0	4						
4	223	5000	P	S	0	1	T	0	4						
5	231	5000	P	S	0	1									
6	232	5000	P	S	0	1									
7	241	5000	P	S	0	1									
8	251	5000	P	S	0	1									
9	252	5000	P	S	0	1									
10	261	5000	P	S	0	1									
11	271	5000	P	S	0	1									
12	272	5000	P	S	0	1									
13	281	5000	P	S	0	1									
14	291	5000	P	S	0	1									
15	311	5000	P	S	0	1									
16	321	5000	P	S	0	1									
17	322	5000	P	S	0	1									
18	331	5000	P	S	0	1	T	0	4						
19	341	5000	P	S	0	1	T	0	4						
20	342	5000	P	S	0	1	T	0	4						
21	343	5000	P	S	0	1	T	0	4						
22	351	5000	P	S	0	1									
23	352	5000	P	S	0	1									
24	411	5000	P	S	0	1									
25	412	5000	P	S	0	1									

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W C A T O I 8 I O I L 4 I O 7 I 9										W DUP 2 DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	4 4 1	5000	P	S 0 1	
2	4 5 1	5000	P	S 0 1	
3	4 6 1	5000	P	S 0 1	
4	4 7 1	5000	P	S 0 1	
5	4 8 1	5000	P	S 0 1	
6	4 9 1	5000	P	S 0 1	
7	5 1 1	5000	P	S 0 1	
8	5 1 2	5000	P	S 0 1	
9	5 1 3	5000	P	S 0 1	
10	5 2 1	5000	P	S 0 1	
11	5 3 1	5000	P	S 0 1	
12	5 4 1	5000	P	S 0 1	
13	5 5 1	10000	P	S 0 1	T 0 4
14	5 6 1	5000	P	S 0 1	T 0 4
15	5 7 1	5000	P	S 0 1	
16	5 8 1	5000	P	S 0 1	
17	5 9 1	5000	P	S 0 1	
18	6 1 1	5000	P	S 0 1	
19	6 1 2	5000	P	S 0 1	
20	6 1 3	5000	P	S 0 1	
21	F 0 3 7	10000	P	S 0 1	T 0 4
22	F 0 3 8	10000	P	S 0 1	T 0 4
23	F 0 3 9	5000	P	S 0 1	T 0 4
24	K 1 0 7	1000	P	S 0 1	
25	K 1 0 8	1000	P	S 0 1	
26	K 1 0 9	1000	P	S 0 1	

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
C A T 0 8 0 0 1 4 0 7 9										W I D U P									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 1 1 0	1,000	P	S 0 1	
2	K 1 2 3	1,000	P	S 0 1	
3	K 1 2 4	1,000	P	S 0 1	
4	K 1 2 5	1,000	P	S 0 1	
5	K 1 2 6	1,000	P	S 0 1	
6	K 1 3 1	1,000	P	S 0 1	
7	K 1 3 2	1,000	P	S 0 1	
8	F 0 3 2	30,000	P	S 0 1	
9	F 0 3 4	30,000	P	S 0 1	
10	F 0 3 5	30,000	P	S 0 1	
11	K 0 8 8	1,000	P	S 0 1	
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA I.D. Number (Enter from page 1)

C A T O 8 0 0 1 4 0 7 9

Secondary ID Number (Enter from page 1)

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

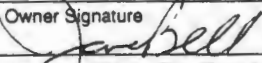
XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature



Date Signed

5/19/95

Name and Official Title (Type or print)

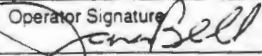
VP Tech + Reg Affairs

Owner Signature

Date Signed

Name and Official Title (Type or print)

Operator Signature



Date Signed

5/19/95

Name and Official Title (Type or print)

VP Tech + Reg Affairs

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Part A, Permit Process --- Internal Checklist

ID Number CAT080014079

Inst Name Bay Area Environmental

PHASE ONE

Refer to
Form No:

Interim Regulatory Requirements

Indicate by
your initials:
Yes No

Valid
PrmIg
Date?

1 T/S/D Facility? (If No, return to respondent.)

Yes No

3 Form 1 received?

Yes No

1 Form 3 received?

Yes No

1 & 3 Postmarked on or before November 19, 1980?

Yes No

Apr. 29, 1981

3 Date of operation entered?

Yes No

3 Date of operation on or before November 19, 1980?

Yes No

X

Notif.
record

Notifier?

Yes No

Notified on or before August 18, 1980?

Yes No

Dec. 12, 1980

1 Form 1, XIII B signed?

Yes No

3 Form 3, IX B Signed?

Yes No

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: _____)

PHASE TWO

1 Unsure if regulated or non-regulated?

Yes No

3 New facility?

Yes No

1 & 3 Core items missing? If Yes, indicate which items:

Facility name____; location____; mail address____; operator info____;

certification____; process info____; waste info____; owner____; sigs____.

owner/op. same??

PHASE THREE

1 & 3 Non-core items missing? If Yes, indicate which items:

Maps____; photos *X*; drawings *X*; lat/long *X*.

Other observations and comments:

Sic codes

Received Date Stamp

29 APR 1981

Log out/Log in

FORM 1 GENERAL	 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permit Program</i> <i>(Read the "General Instructions" before starting.)</i>	EPA I.D. NUMBER: <div style="border: 1px solid black; padding: 2px; display: inline-block;"> C A T 0 8 0 0 1 4 0 7 9 </div>
III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE	
		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-8 which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP CALIFORNIA ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION
---	---

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)			
2	JAMES T. BELL, VICE PRESIDENT	201	347	711	

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	1125 HENSLEY STREET	RICHMOND	CA	94804	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
5	1125 HENSLEY STREET				
B. COUNTY NAME					
CONTRA COSTA					
C. CITY OR TOWN			D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6	RICHMOND	CA	94804		

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
(specify)										(specify)									
C. THIRD										D. FOURTH									
(specify)										(specify)									

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?									
8: CALIFORNIA ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F - FEDERAL S - STATE P - PRIVATE										M - PUBLIC (other than federal or state) O - OTHER (specify)									
P PRIVATE										4 1 5 2 3 3 8 0 0 1									
E. STREET OR P.O. BOX																			
1 1 2 5 H E N S L E Y S T R E E T																			
F. CITY OR TOWN										G. STATE H. ZIP CODE									
B R I C H M O N D										CA 9 4 8 0 4									
										IX. INDIAN LAND									
										Is the facility located on Indian lands?									
										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										(specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
R C A T 0 8 0 0 1 4 0 7 9										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Hazardous waste transfer and storage facility.
(Refer to Exhibit C for topographic map.)

In addition, CAETC will bulk petroleum hydrocarbon-contaminated soil and debris, household hazardous waste, materials with economic value destined for recycling, and a drum crusher on site.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
James T. Bell, Vice President Technical & Regulatory Affairs										James Bell										12/21/90									

COMMENTS FOR OFFICIAL USE ONLY

C									
---	--	--	--	--	--	--	--	--	--

Please print or type in the unsnaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters each).

Approved OMB No. 158-S80004



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

FCAT0800140791

OFFICIAL USE ONLY

LOCATION DATE RECEIVED
PROVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

YR. MO. DAY
83 07 01

FOR EXISTING FACILITIES. PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY
73 74 75 76 77 78

FOR NEW FACILITIES. PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

T/A C
1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
1	S 0 2	600	G		5				
2	T 0 3	20	E		6				
3	S 0 1	61,600	G		7				
4	T 0 4	60	Y		8				
					9				
					10				

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY																							
B											T	A	C	B											T	A	C								
W	C	A	T	0	8	0	0	1	4	0	7	9	1	W	DUP										2	DUP									

F. DESCRIPTION OF HAZARDOUS WASTE												D. PROCESSES											
EPA NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (If a code is not entered in D(1))								
	25	26	27	28			29	30	31	32	33	34	35	36	37	38	39	40					
1	D	0	0	1	375	T	S	0	1														
2	D	0	0	2	250	T	S	0	1														
3	D	0	0	3	13	T	S	0	1														
4	D	0	0	4	6	T	S	0	1														
5	D	0	0	5	6	T	S	0	1														
6	D	0	0	6	6	T	S	0	1														
7	D	0	0	7	6	T	S	0	1														
8	D	0	0	8	6	T	S	0	1														
9	D	0	0	9	6	T	S	0	1														
10	D	0	1	0	250	T	S	0	1														
11	D	0	1	1	250	P	S	0	1														
12	D	0	1	2	250	P	S	0	1														
13	D	0	1	3	250	P	S	0	1														
14	D	0	1	4	250	P	S	0	1														
15	D	0	1	5	250	P	S	0	1														
16	D	0	1	6	250	P	S	0	1														
17	D	0	1	7	250	P	S	0	1														
18	F	0	0	1	50	T	S	0	1														
19	F	0	0	2	75	T	S	0	1														
20	F	0	0	3	250	T	S	0	1														
21	F	0	0	4	5	T	S	0	1														
22	F	0	0	5	50	T	S	0	1														
23	F	0	0	6	25	T	S	0	1														
24	F	0	0	7	2500	P	S	0	1														
25	F	0	0	8	2500	P	S	0	1														
26	F	0	0	9	2500	P	S	0	1														

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W C A T 0 8 0 0 1 4 0 7 9													W DUP												
V. DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES												
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (If a code is not entered in D(1))					
	27	28	29	30	31	32		33	34	35	36	37	38	39	40	41	42	43	44		45	46	47	48	49
1	F	0	1	0	700		P	S	0	1															
2	F	0	1	1	850		P	S	0	1															
3	F	0	1	2	900		P	S	0	1															
4	F	0	1	9	900		P	S	0	1															
5	F	0	2	0	500		P	S	0	1															
6	F	0	2	1	400		P	S	0	1															
7	F	0	2	2	500		P	S	0	1															
8	F	0	2	3	600		P	S	0	1															
9	F	0	2	4	700		P	S	0	1															
10	F	0	2	6	900		P	S	0	1															
11	F	0	2	7	900		P	S	0	1															
12	F	0	2	8	900		P	S	0	1															
13	K	0	0	1	1500		P	S	0	1															
14	K	0	0	2	900		P	S	0	1															
15	K	0	0	3	1400		P	S	0	1															
16	K	0	0	4	900		P	S	0	1															
17	K	0	0	5	900		P	S	0	1															
18	K	0	0	6	900		P	S	0	1															
19	K	0	0	7	1400		P	S	0	1															
20	K	0	0	8	900		P	S	0	1															
21	K	0	0	9	550		P	S	0	1															
22	K	0	1	0	900		P	S	0	1															
23	K	0	1	1	1400		P	S	0	1															
24	K	0	1	3	800		P	S	0	1															
25	K	0	1	4	750		P	S	0	1															
26	K	0	1	5	900		P	S	0	1															

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 13 14 15 </div>												<div style="display: flex; justify-content: space-between;"> W DUP 13 14 15 16 17 18 19 20 </div>											

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
				27	28	29	30	31	32	33	34	35	36
1	K 0 1 6	900	P	S	0	1							
2	K 0 1 7	900	P	S	0	1							
3	K 0 1 8	900	P	S	0	1							
4	K 0 1 9	900	P	S	0	1							
5	K 0 2 0	850	P	S	0	1							
6	K 0 2 1	500	P	S	0	1							
7	K 0 2 2	900	P	S	0	1							
8	K 0 2 3	750	P	S	0	1							
9	K 0 2 4	900	P	S	0	1							
10	K 0 9 3	500	P	S	0	1							
11	K 0 9 4	750	P	S	0	1							
12	K 0 2 5	750	P	S	0	1							
13	K 0 2 6	900	P	S	0	1							
14	K 0 2 7	900	P	S	0	1							
15	K 0 2 8	900	P	S	0	1							
16	K 0 2 9	950	P	S	0	1							
17	K 0 9 5	700	P	S	0	1							
18	K 0 9 6	550	P	S	0	1							
19	K 0 3 0	750	P	S	0	1							
20	K 0 8 3	700	P	S	0	1							
21	K 1 0 3	700	P	S	0	1							
22	K 1 0 4	600	P	S	0	1							
23	K 0 8 5	900	P	S	0	1							
24	K 1 0 5	900	P	S	0	1							
25	K 0 7 1	700	P	S	0	1							
26	K 0 7 3	850	P	S	0	1							

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
W C A T 0 8 0 0 1 4 0 7 9 1												W DUP 2 DUP											

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	K 1 0 6	900	P	S 0 1	
2	K 1 1 1	900	P	S 0 1	
3	K 1 1 2	750	P	S 0 1	
4	K 1 1 3	850	P	S 0 1	
5	K 1 1 4	700	P	S 0 1	
6	K 1 1 5	750	P	S 0 1	
7	K 1 1 6	900	P	S 0 1	
8	K 1 1 7	850	P	S 0 1	
9	K 1 1 8	850	P	S 0 1	
10	K 1 3 6	600	P	S 0 1	
11	K 0 3 1	800	P	S 0 1	
12	K 0 3 2	850	P	S 0 1	
13	K 0 3 3	900	P	S 0 1	
14	K 0 3 4	900	P	S 0 1	
15	K 0 9 7	900	P	S 0 1	
16	K 0 3 5	900	P	S 0 1	
17	K 0 3 6	850	P	S 0 1	
18	K 0 3 7	800	P	S 0 1	
19	K 0 3 8	900	P	S 0 1	
20	K 0 3 9	700	P	S 0 1	
21	K 0 4 0	700	P	S 0 1	
22	K 0 4 1	700	P	S 0 1	
23	K 0 9 8	850	P	S 0 1	
24	K 0 4 2	850	P	S 0 1	
25	K 0 4 3	600	P	S 0 1	
26	K 0 9 9	600	P	S 0 1	

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
W C A T 0 8 0 0 1 4 0 7 9 1												W DUP 2 DUP											

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

W C Z	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)											
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	K 0 4 4	750	P	S 0 1											
2	K 0 4 5	750	P	S 0 1											
3	K 0 4 6	900	P	S 0 1											
4	K 0 4 7	900	P	S 0 1											
5	K 0 4 8	500	P	S 0 1											
6	K 0 4 9	500	P	S 0 1											
7	K 0 5 0	750	P	S 0 1											
8	K 0 5 1	350	P	S 0 1											
9	K 0 5 2	500	P	S 0 1											
10	P 0 1 7	225	P	S 0 1											
11	P 0 1 8	900	P	S 0 1											
12	P 0 2 0	700	P	S 0 1											
13	P 0 2 1	600	P	S 0 1											
14	P 0 2 2	750	P	S 0 1											
15	P 0 2 3	850	P	S 0 1											
16	P 0 2 4	225	P	S 0 1											
17	P 0 2 6	750	P	S 0 1											
18	P 0 2 7	550	P	S 0 1											
19	P 0 2 8	850	P	S 0 1											
20	P 0 2 9	750	P	S 0 1											
21	P 0 3 0	2100	P	S 0 1											
22	P 0 3 1	1200	P	S 0 1											
23	P 0 3 3	700	P	S 0 1											
24	P 0 3 6	900	P	S 0 1											
25	P 0 3 7	225	P	S 0 1											
26	P 0 3 8	900	P	S 0 1											

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C </div>												
<div style="display: flex; justify-content: space-between;"> 2 13 14 15 </div>													<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 23 </div>												

J. DESCRIPTION OF HAZARDOUS WASTES (continued)

J. NO.	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26 27	28	35	27 - 29 27 - 29 27 - 29 27 - 29	
1	P039	900	P	S01	
2	P040	950	P	S01	
3	P041	900	P	S01	
4	P042	700	P	S01	
5	P043	250	P	S01	
6	P044	900	P	S01	
7	P045	750	P	S01	
8	P046	900	P	S01	
9	P047	800	P	S01	
10	K061	700	P	S01	
11	K062	850	P	S01	
12	K069	900	P	S01	
13	K100	900	P	S01	
14	K084	900	P	S01	
15	K101	850	P	S01	
16	K102	900	P	S01	
17	K086	700	P	S01	
18	K060	900	P	S01	
19	K087	700	P	S01	
20	P001	900	P	S01	
21	P002	500	P	S01	
22	P003	750	P	S01	
23	P004	225	P	S01	
24	P005	225	P	S01	
25	P006	750	P	S01	
26	P007	350	P	S01	

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 1 T/A C </div>															<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>									
<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 </div>															<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 23 24 </div>									

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

J Z O J Z	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
	23	24	27	33	36	27	28	27	28	27	28	27	28	27	28	27	28		
1	P 0 0 8	900	P		S 0 1														
2	P 0 0 9	850	P		S 0 1														
3	P 0 1 0	225	P		S 0 1														
4	P 0 1 1	225	P		S 0 1														
5	P 0 1 2	225	P		S 0 1														
6	P 0 1 3	1400	P		S 0 1														
7	P 0 1 4	225	P		S 0 1														
8	P 0 1 5	2000	P		S 0 1														
9	P 0 1 6	225	P		S 0 1														
10	P 0 4 8	225	P		S 0 1														
11	P 0 4 9	900	P		S 0 1														
12	P 0 5 0	900	P		S 0 1														
13	P 0 5 1	1200	P		S 0 1														
14	P 0 5 4	750	P		S 0 1														
15	P 0 5 6	700	P		S 0 1														
16	P 0 5 7	600	P		S 0 1														
17	P 0 5 8	850	P		S 0 1														
18	P 0 5 9	900	P		S 0 1														
19	P 0 6 0	900	P		S 0 1														
20	P 0 6 2	900	P		S 0 1														
21	P 0 6 4	225	P		S 0 1														
22	P 0 6 5	800	P		S 0 1														
23	P 0 6 6	800	P		S 0 1														
24	P 0 6 7	450	P		S 0 1														
25	P 0 6 8	225	P		S 0 1														
26	P 0 6 9	700	P		S 0 1														

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>												
<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 </div>													<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 23 - 24 </div>												

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO. (enter code)	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
				27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	
1	P 0 7 0	700	P	S 0 1											
2	P 0 7 1	900	P	S 0 1											
3	P 0 7 2	950	P	S 0 1											
4	P 0 7 3	500	P	S 0 1											
5	P 0 7 4	1250	P	S 0 1											
6	P 0 7 5	700	P	S 0 1											
7	P 0 7 6	600	P	S 0 1											
8	P 0 7 7	225	P	S 0 1											
9	P 0 7 8	750	P	S 0 1											
10	P 0 8 1	500	P	S 0 1											
11	P 0 8 2	225	P	S 0 1											
12	P 0 8 4	600	P	S 0 1											
13	P 0 8 5	900	P	S 0 1											
14	P 0 8 7	850	P	S 0 1											
15	P 0 8 8	900	P	S 0 1											
16	P 0 8 9	900	P	S 0 1											
17	P 0 9 2	700	P	S 0 1											
18	P 0 9 3	700	P	S 0 1											
19	P 0 9 4	900	P	S 0 1											
20	P 0 9 5	550	P	S 0 1											
21	P 0 9 6	900	P	S 0 1											
22	P 0 9 7	700	P	S 0 1											
23	P 0 9 8	1300	P	S 0 1											
24	P 0 9 9	900	P	S 0 1											
25	P 1 0 1	225	P	S 0 1											
26	P 1 0 2	900	P	S 0 1											

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY														
S											T/A	C	S											
W	C	A	T	0	8	0	0	1	4	0	7	9	1	W	DUP									
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY											
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>											

Y. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																								
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																				
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	U 0 0 7	1200	P	S	0	1																						
2	U 0 0 8	1600	P	S	0	1																						
3	U 0 0 9	500	P	S	0	1																						
4	U 0 1 0	900	P	S	0	1																						
5	U 0 1 1	700	P	S	0	1																						
6	U 0 1 2	900	P	S	0	1																						
7	U 0 1 4	700	P	S	0	1																						
8	U 0 1 5	750	P	S	0	1																						
9	U 0 1 6	900	P	S	0	1																						
10	U 0 1 7	700	P	S	0	1																						
11	U 0 1 8	750	P	S	0	1																						
12	U 0 1 9	900	P	S	0	1																						
13	U 0 2 0	950	P	S	0	1																						
14	U 0 2 1	250	P	S	0	1																						
15	U 0 2 2	900	P	S	0	1																						
16	U 0 2 3	850	P	S	0	1																						
17	U 0 2 4	900	P	S	0	1																						
18	U 0 2 5	700	P	S	0	1																						
19	U 0 2 6	900	P	S	0	1																						
20	U 0 2 7	900	P	S	0	1																						
21	U 0 2 8	500	P	S	0	1																						
22	U 0 2 9	900	P	S	0	1																						
23	U 0 3 0	500	P	S	0	1																						
24	U 0 3 1	900	P	S	0	1																						
25	U 0 3 2	750	P	S	0	1																						
26	U 0 3 3	900	P	S	0	1																						

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																				
S													T/A	C	S													T/A	C				
W	C	A	T	0	8	0	0	1	4	0	7	9			1	W	DUP												2	DUP			
1	2											13	14	15	1	2											13	14	15	23			26

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W C A T 0 8 0 0 1 4 0 7 9													W D U P												
1 2 3 4 5 6 7 8 9 10 11 12													1 2 3 4 5 6 7 8 9 10 11 12												

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES			
				1. PROCESS CODES (enter)			
				27 - 29	27 - 29	27 - 29	27 - 29
1	U 0 8 9	250	P	S 0 1			
2	U 0 9 0	900	P	S 0 1			
3	U 0 9 1	1300	P	S 0 1			
4	U 0 9 2	900	P	S 0 1			
5	U 0 9 3	700	P	S 0 1			
6	U 0 9 4	900	P	S 0 1			
7	U 0 9 5	900	P	S 0 1			
8	U 0 9 6	700	P	S 0 1			
9	U 0 9 7	700	P	S 0 1			
10	U 0 9 8	250	P	S 0 1			
11	U 0 9 9	250	P	S 0 1			
12	U 1 0 1	750	P	S 0 1			
13	U 1 0 2	250	P	S 0 1			
14	U 1 0 3	250	P	S 0 1			
15	U 1 0 5	900	P	S 0 1			
16	U 1 0 6	250	P	S 0 1			
17	U 1 0 7	900	P	S 0 1			
18	U 1 0 8	900	P	S 0 1			
19	U 1 0 9	900	P	S 0 1			
20	U 1 1 0	700	P	S 0 1			
21	U 1 1 1	700	P	S 0 1			
22	U 1 1 2	750	P	S 0 1			
23	U 1 1 3	250	P	S 0 1			
24	U 1 1 4	700	P	S 0 1			
25	U 1 1 5	700	P	S 0 1			
26	U 1 1 7	700	P	S 0 1			

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> WCAT080014079 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C </div>												
<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 </div>													<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 23 - 26 </div>												

I. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
				27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29				
1	U 0 6 2	900	P	S 0 1											
2	U 0 6 3	900	P	S 0 1											
3	U 0 6 4	900	P	S 0 1											
4	U 0 6 6	900	P	S 0 1											
5	U 0 6 7	900	P	S 0 1											
6	U 0 6 8	900	P	S 0 1											
7	U 0 6 9	750	P	S 0 1											
8	U 0 7 0	750	P	S 0 1											
9	U 0 7 1	750	P	S 0 1											
10	U 0 7 2	750	P	S 0 1											
11	U 0 7 3	900	P	S 0 1											
12	U 0 7 4	250	P	S 0 1											
13	U 0 7 5	800	P	S 0 1											
14	U 0 7 6	600	P	S 0 1											
15	U 0 7 7	250	P	S 0 1											
16	U 0 7 8	700	P	S 0 1											
17	U 0 7 9	600	P	S 0 1											
18	U 0 8 0	500	P	S 0 1											
19	U 0 8 1	850	P	S 0 1											
20	U 0 8 2	850	P	S 0 1											
21	U 0 8 3	850	P	S 0 1											
22	U 0 8 4	850	P	S 0 1											
23	U 0 8 5	900	P	S 0 1											
24	U 0 8 6	700	P	S 0 1											
25	U 0 8 7	750	P	S 0 1											
26	U 0 8 8	750	P	S 0 1											

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W C A T 0 8 0 0 1 4 0 7 9													W D U P												
1 2 3 4 5 6 7 8 9 10 11 12													1 2 3 4 5 6 7 8 9 10 11 12												
C. DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES												
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																	
				27	28	29	30	31	32	33	34	35	36												
1	U 1 1 7	700	P	S	0	1																			
2	U 1 1 8	700	P	S	0	1																			
3	U 1 1 9	900	P	S	0	1																			
4	U 1 2 0	900	P	S	0	1																			
5	U 1 2 1	900	P	S	0	1																			
6	U 1 2 2	2100	P	S	0	1																			
7	U 1 2 3	250	P	S	0	1																			
8	U 1 2 4	250	P	S	0	1																			
9	U 1 2 5	700	P	S	0	1																			
10	U 1 2 6	900	P	S	0	1																			
11	U 1 2 7	900	P	S	0	1																			
12	U 1 2 8	900	P	S	0	1																			
13	U 1 2 9	250	P	S	0	1																			
14	U 1 3 0	750	P	S	0	1																			
15	U 1 3 1	500	P	S	0	1																			
16	U 1 3 2	700	P	S	0	1																			
17	U 1 3 3	900	P	S	0	1																			
18	U 1 3 4	800	P	S	0	1																			
19	U 1 3 5	250	P	S	0	1																			
20	U 1 3 6	250	P	S	0	1																			
21	U 1 3 7	900	P	S	0	1																			
22	U 1 3 8	700	P	S	0	1																			
23	U 1 3 9	700	P	S	0	1																			
24	U 1 4 0	900	P	S	0	1																			
25	U 1 4 1	700	P	S	0	1																			
26	U 1 4 2	700	P	S	0	1																			

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 T/A C 1 </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>												

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO. (enter code)	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))
23	24	25	26	27	28	29	30	31
1	U 1 4 3	900	P	S 0 1				
2	U 1 4 4	900	P	S 0 1				
3	U 1 4 5	400	P	S 0 1				
4	U 1 4 6	1400	P	S 0 1				
5	U 1 4 7	750	P	S 0 1				
6	U 1 4 8	800	P	S 0 1				
7	U 1 4 9	900	P	S 0 1				
8	U 1 5 0	900	P	S 0 1				
9	U 1 5 1	900	P	S 0 1				
10	U 1 5 2	900	P	S 0 1				
11	U 1 5 3	900	P	S 0 1				
12	U 1 5 4	1600	P	S 0 1				
13	U 1 5 5	750	P	S 0 1				
14	U 1 5 6	900	P	S 0 1				
15	U 1 5 7	900	P	S 0 1				
16	U 1 5 8	900	P	S 0 1				
17	U 1 5 9	900	P	S 0 1				
18	U 1 6 0	700	P	S 0 1				
19	U 1 6 1	700	P	S 0 1				
20	U 1 6 2	900	P	S 0 1				
21	U 1 6 3	850	P	S 0 1				
22	U 1 6 4	750	P	S 0 1				
23	U 1 6 5	900	P	S 0 1				
24	U 1 6 6	600	P	S 0 1				
25	U 1 6 7	900	P	S 0 1				
26	U 1 6 8	700	P	S 0 1				

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY									
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W D U P T/A C D U P </div>									
<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 </div>													<div style="display: flex; justify-content: space-between;"> 1 2 13 14 15 23 </div>									

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 28	27	26	27 - 29	27 - 29
1	U 1 6 9	250	P	S 0 1	
2	U 1 7 0	250	P	S 0 1	
3	U 1 7 1	250	P	S 0 1	
4	U 1 7 2	900	P	S 0 1	
5	U 1 7 3	700	P	S 0 1	
6	U 1 7 4	800	P	S 0 1	
7	U 1 7 6	950	P	S 0 1	
8	U 1 7 7	700	P	S 0 1	
9	U 1 7 8	750	P	S 0 1	
10	U 1 7 9	900	P	S 0 1	
11	U 1 8 0	800	P	S 0 1	
12	U 1 8 1	900	P	S 0 1	
13	U 1 8 2	900	P	S 0 1	
14	U 1 8 3	900	P	S 0 1	
15	U 1 8 4	850	P	S 0 1	
16	U 1 8 5	750	P	S 0 1	
17	U 1 8 6	500	P	S 0 1	
18	U 1 8 7	800	P	S 0 1	
19	U 1 8 8	2100	P	S 0 1	
20	U 1 8 9	750	P	S 0 1	
21	U 1 9 0	900	P	S 0 1	
22	U 1 9 1	900	P	S 0 1	
23	U 1 9 2	800	P	S 0 1	
24	U 1 9 3	750	P	S 0 1	
25	U 1 9 4	900	P	S 0 1	
26	U 1 9 6	250	P	S 0 1	

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																
W C A T 0 8 0 0 1 4 0 7 9 1													W DUP 2 DUP																
Y. DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES																
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
	22	23	24	25	26	27	28	29		30	31	32	33	34	35	36	37	38	39	40	41		42	43	44	45	46	47	48
1	U	1	9	7				950		P	S	0	1																
2	U	2	0	0				750		P	S	0	1																
3	U	2	0	1				900		P	S	0	1																
4	U	2	0	2				900		P	S	0	1																
5	U	2	0	3				750		P	S	0	1																
6	U	2	0	4				700		P	S	0	1																
7	U	2	0	5				700		P	S	0	1																
8	U	2	0	6				900		P	S	0	1																
9	U	2	0	7				900		P	S	0	1																
10	U	2	0	8				900		P	S	0	1																
11	U	2	0	9				900		P	S	0	1																
12	U	2	1	0				700		P	S	0	1																
13	U	2	1	1				700		P	S	0	1																
14	U	2	1	3				700		P	S	0	1																
15	U	2	1	4				750		P	S	0	1																
16	U	2	1	5				900		P	S	0	1																
17	U	2	1	6				700		P	S	0	1																
18	U	2	1	7				700		P	S	0	1																
19	U	2	1	8				900		P	S	0	1																
20	U	2	1	9				900		P	S	0	1																
21	U	2	2	0				2100		P	S	0	1																
22	U	2	2	1				700		P	S	0	1																
23	U	2	2	2				800		P	S	0	1																
24	U	2	2	3				900		P	S	0	1																
25	U	2	2	5				700		P	S	0	1																
26	U	2	2	6				1600		P	S	0	1																

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
<div style="display: flex; justify-content: space-between;"> W C A T 0 8 0 0 1 4 0 7 9 T/A C </div>												<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>											
1 2 - 13 14 15												1 2 - 13 14 15 23 - 26											

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
				27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29		
1	U 2 2 7	950	P	S 0 1									
2	U 2 2 8	900	P	S 0 1									
3	U 2 3 4	700	P	S 0 1									
4	U 2 3 5	900	P	S 0 1									
5	U 2 3 6	900	P	S 0 1									
6	U 2 3 7	700	P	S 0 1									
7	U 2 3 8	750	P	S 0 1									
8	U 2 3 9	1600	P	S 0 1									
9	U 2 4 0	700	P	S 0 1									
10	U 2 4 2	900	P	S 0 1									
11	U 2 4 3	900	P	S 0 1									
12	U 2 4 6	700	P	S 0 1									
13	U 2 4 7	700	P	S 0 1									
14	U 2 4 8	900	P	S 0 1									
15	U 2 4 9	900	P	S 0 1									
16	U 3 2 8	900	P	S 0 1									
17	U 3 5 3	900	P	S 0 1									
18	U 2 4 4	900	P	S 0 1									
19	U 3 5 9	900	P	S 0 1									
20	D 0 1 8	500	T	S 0 1	T 0 4								
21	D 0 1 9	750	T	S 0 1	T 0 4								
22	D 0 2 0	750	T	S 0 1	T 0 4								
23	D 0 2 1	750	T	S 0 1	T 0 4								
24	D 0 2 2	750	T	S 0 1	T 0 4								
25	D 0 2 3	750	T	S 0 1	T 0 4								
26	D 0 2 4	750	T	S 0 1	T 0 4								

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY									
<div style="display: flex; justify-content: space-between;"> WCAT080014079 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>									
1 2 3 4 5 6 7 8 9 10 11 12													13 14 15 16 17 18 19 20 21 22 23 24 25 26									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
	23	24	27	36	27	28	29	27	28	29	27	28	29		
1	D 0 2 5	750	T	S	0	1	T	0	4						
2	D 0 2 6	750	T	S	0	1	T	0	4						
3	D 0 2 7	750	T	S	0	1	T	0	4						
4	D 0 2 8	750	T	S	0	1	T	0	4						
5	D 0 2 9	750	T	S	0	1	T	0	4						
6	D 0 3 0	750	T	S	0	1	T	0	4						
7	D 0 3 1	750	T	S	0	1	T	0	4						
8	D 0 3 2	750	T	S	0	1	T	0	4						
9	D 0 3 3	750	T	S	0	1	T	0	4						
10	D 0 3 4	750	T	S	0	1	T	0	4						
11	D 0 3 5	750	T	S	0	1	T	0	4						
12	D 0 3 6	750	T	S	0	1	T	0	4						
13	D 0 3 7	750	T	S	0	1	T	0	4						
14	D 0 3 8	750	T	S	0	1	T	0	4						
15	D 0 3 9	750	T	S	0	1	T	0	4						
16	D 0 4 0	750	T	S	0	1	T	0	4						
17	D 0 4 1	750	T	S	0	1	T	0	4						
18	D 0 4 2	750	T	S	0	1	T	0	4						
19	D 0 4 3	750	T	S	0	1	T	0	4						
20	7 1 1	5000	P	S	0	1									
21	7 2 1	5000	P	S	0	1									
22	7 2 2	5000	P	S	0	1									
23	7 2 3	5000	P	S	0	1									
24	7 2 4	5000	P	S	0	1									
25	7 2 5	5000	P	S	0	1									
26	7 2 6	5000	P	S	0	1									

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W C A T 0 8 0 0 1 4 0 7 9 1													W DUP 2 DUP												
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26													1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26												

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

J Z O J Z	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)											
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	7 2 7	5000	P	S 0 1											
2	7 2 8	5000	P	S 0 1											
3	7 3 1	5000	P	S 0 1											
4	7 4 1	5000	P	S 0 1											
5	7 5 1	5000	P	S 0 1											
6	7 9 1	5000	P	S 0 1											
7	7 9 2	5000	P	S 0 1											
8	8 0 1	5000	P	S 0 1											
9	1 2 1	5000	P	S 0 1											
10	1 2 2	5000	P	S 0 1											
11	1 2 3	5000	P	S 0 1											
12	1 3 1	5000	P	S 0 1											
13	1 3 2	5000	P	S 0 1											
14	1 3 3	5000	P	S 0 1											
15	1 3 4	5000	P	S 0 1											
16	1 3 5	5000	P	S 0 1											
17	1 4 1	5000	P	S 0 1											
18	1 5 1	5000	P	S 0 1											
19	1 6 1	5000	P	S 0 1											
20	1 6 2	5000	P	S 0 1											
21	1 7 1	5000	P	S 0 1											
22	1 7 2	5000	P	S 0 1											
23	1 8 1	5000	P	S 0 1											
24	2 1 1	5000	P	S 0 1 T 0 4											
25	2 1 2	5000	P	S 0 1											
26	2 1 3	5000	P	S 0 1											

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY															
S										T/A	C		S										T/A	C	
W	C	A	T	0	8	0	0	1	4	0	7	9	1	W	DUP									2	DUP
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26

J Z JZ	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
	23	24	25	26	27	28		29	30	31	32	33	34	35	36
1	2	1	4		5000		P	S	0	1					
2	2	2	1		10000		P	S	0	1	T	0	4		
3	2	2	2		5000		P	S	0	1	T	0	4		
4	2	2	3		5000		P	S	0	1	T	0	4		
5	2	3	1		5000		P	S	0	1					
6	2	3	2		5000		P	S	0	1					
7	2	4	1		5000		P	S	0	1					
8	2	5	1		5000		P	S	0	1					
9	2	5	2		5000		P	S	0	1					
10	2	6	1		5000		P	S	0	1					
11	2	7	1		5000		P	S	0	1					
12	2	7	2		5000		P	S	0	1					
13	2	8	1		5000		P	S	0	1					
14	2	9	1		5000		P	S	0	1					
15	3	1	1		5000		P	S	0	1					
16	3	2	1		5000		P	S	0	1					
17	3	2	2		5000		P	S	0	1					
18	3	3	1		5000		P	S	0	1	T	0	4		
19	3	4	1		5000		P	S	0	1	T	0	4		
20	3	4	2		5000		P	S	0	1	T	0	4		
21	3	4	3		5000		P	S	0	1	T	0	4		
22	3	5	1		5000		P	S	0	1					
23	3	5	2		5000		P	S	0	1					
24	4	1	1		5000		P	S	0	1					
25	4	2	1		5000		P	S	0	1					
26	4	3	1		5000		P	S	0	1					

Continued from page 2.

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EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
S	W	C	A	T	0	8	0	0	1	4	0	7	9	1	S	W	D	U	P	T/A	C	2	D	U	P		
1	2														13	14	15	23		26							

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

1 J N O J Z	A. EPA HAZARD. WASTENO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																						
	23	24	25			1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))																
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1		4	4	1	5000					P	S	0	1															
2		4	5	1	5000					P	S	0	1															
3		4	6	1	5000					P	S	0	1															
4		4	7	1	5000					P	S	0	1															
5		4	8	1	5000					P	S	0	1															
6		4	9	1	5000					P	S	0	1															
7		5	1	1	5000					P	S	0	1															
8		5	1	2	5000					P	S	0	1															
9		5	1	3	5000					P	S	0	1															
10		5	2	1	5000					P	S	0	1															
11		5	3	1	5000					P	S	0	1															
12		5	4	1	5000					P	S	0	1															
13		5	5	1	10000					P	S	0	1		T	0	4											
14		5	6	1	5000					P	S	0	1		T	0	4											
15		5	7	1	5000					P	S	0	1															
16		5	8	1	5000					P	S	0	1															
17		5	9	1	5000					P	S	0	1															
18		6	1	1	5000					P	S	0	1															
19		6	1	2	5000					P	S	0	1															
20		6	1	3	5000					P	S	0	1															
21	F	0	3	7	10000					P	S	0	1		T	0	4											
22	F	0	3	8	10000					P	S	0	1		T	0	4											
23	F	0	3	9	5000					P	S	0	1		T	0	4											
24																												
25																												
26																												

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

CIAIT 08:010114 0719 6

FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

CILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

37 56 056

122 21 049

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

CALIFORNIA ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION

415 233-8001

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

1125 Hensley Street

G Richmond

CA

94804

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

Robert W. Landmesser

Robert W. Landmesser

12-27-90

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

James T. Bell

James T. Bell

12/21/90

FORM 1	GENERAL INFORMATION	ACTION AGENCY	I. EPA I.D. NUMBER	
Consolidated Form and the "General Instructions" before use.				
GENERAL INSTRUCTIONS				
I. EPA I.D. NUMBER	PLEASE PLACE LABEL IN THIS SPACE APR 1981			
III. FACILITY NAME				
V. FACILITY MAILING ADDRESS				
VI. FACILITY LOCATION				

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, or through it and enter the correct data in appropriate fill-in areas below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	BAY AREA ENVIRONMENTAL
---	------	------------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 BILL WAHREN		415 235 5400	

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 253 JENKINSBURY AVE			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4 RICHMOND		CA	94801

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER				
5 225 PARK BLVD				
B. COUNTY NAME				
CENTRA COSTA				
C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 RICHMOND		CA	94801	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
(specify)										(specify)									
C. THIRD										D. FOURTH									
(specify)										(specify)									

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?									
RAY AIR ENVIRONMENTAL										<input type="checkbox"/> YES <input type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE										(specify) PRIVATE 415 235 942									
E. STREET OR P.O. BOX																			
2500 TULLSBURY AVE.																			
F. CITY OR TOWN										G. STATE H. ZIP CODE									
RICHMOND										VA 94801									
										IX. INDIAN LAND									
										Is the facility located on Indian lands?									
										<input type="checkbox"/> YES <input type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										(specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Collect and store drums containing hazardous waste for less than 90 days, then transport the drums to an approved disposal site using an approved carrier who complies with state and federal regulations

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
Bill Wabbel										Bill Wabbel										4-29-81									

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--



ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
FCATD3-146

FOR OFFICIAL USE ONLY

APPLICATION APPROVED DATE RECEIVED (yr., mo., & day)
23 24 29

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☒ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY
8 73 74 75 76 77 78

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. MO. DAY
73 74 75 76 77 78

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-Feet	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER		A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER		A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
			1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)					1. AMOUNT	2. UNIT OF MEAS- URE (enter code)	
X-1	16	S02	600	G		5					
X-2	17	T03	20	E		6					
1	18	S01	3800	G		7					
2	19					8					
3	20					9					
4	21					10					

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WASTE NO. (enter code)										WASTE NO. (enter code)									
WASTE NO. (enter code)										WASTE NO. (enter code)									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))											
1	12160																		
2	7300																		
3	9730																		
4	7300																		
5	10945																		
6	18240																		
7	7300																		
8	24000																		
9	6000																		
10	6000																		
11	6000																		
12	6000																		
13																			
14																			
15																			
16																			
17																			
18																			
19																			
20																			
21																			
22																			
23																			
24																			
25																			
26																			

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	C	A	T	0	2	0	0	1	0	7	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	0	.	E	R	I	C	K	S	O	N	I	N	C	.
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

E	F	2	5	5	P	A	R	R	B	L	V	D	C	G	R	I	C	H	M	O	N	D
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

0	E	R	I	C	K	S	O	N	I	N	C	.	Oscar J. Erickson	4-29-81
---	---	---	---	---	---	---	---	---	---	---	---	---	-------------------	---------

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

B	I	L	L	W	A	H	B	E	H	Bill Wahbeh	4-29-81
---	---	---	---	---	---	---	---	---	---	-------------	---------

IB



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

11 MAY 1990
RA/DRA _____
Referred To <u>H-1</u>
CC: _____
File: _____

May 9, 1990

Department of Health Services
Toxic Substances Control Program
Region 2
700 Heinz Avenue, Building F
Berkeley, CA 94710

Attn: Ms. Bonnie Griffith

Dear Bonnie:

I have enclosed Bay Area Environmental's report of the incident that occurred on April 25, 1990.

Should you have any questions, do not hesitate to contact me.

Respectfully submitted,

BAY AREA ENVIRONMENTAL, INC.

Michael F. Kara

Michael F. Kara
General Manager

MFK:abd
Encl.

dhs4.1tr



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

INCIDENT REPORT

APRIL 25, 1990

- I. OWNER/OPERATOR INFORMATION
- II. FACILITY INFORMATION
- III. DESCRIPTION OF INCIDENT
- IV. MATERIAL(S) INVOLVED IN INCIDENT
- V. EXTENT OF INJURIES
- VI. HAZARD(S) ASSESSMENT
- VII. DISPOSITION OF RECOVERED MATERIAL/CORRECTIVE ACTION

incid1.rpt

I. OWNER/OPERATOR INFORMATION

OWNER: Jesus Magana
5 Soft Shadow
El Sobrante, CA 94803
(415) 222-8649

GENERAL MANAGER: Michael Kara
118 Captain's Court
Vallejo, CA 94591
(707) 646-6131

OPERATIONS MANAGER: Daniel Etheredge
739 Golden Gate Avenue
Pt. Richmond, CA 94801
(415) 237-4902

FACILITY TECH ADVISER: Dara Turchi
879 E. 28th Street
Oakland, CA 94610
(415) 763-7422

II. FACILITY INFORMATION

Bay Area Environmental
1125 Hensley Street
Richmond, CA 94801
EPA ID# CAT080014079
(415) 233-8001

III. DESCRIPTION OF INCIDENT

On April 25, 1990 on or about 10:15 pm an explosion occurred in a container (55 gallon steel drum) of hazardous waste located in the flammable storage bay of Bay Area Environmental. The explosion caused structural damage to the storage shed and water line as well as chemical contamination (from the contents inside the drum) on the inside of the bay and on the surfaces of other drums that were stored in that bay. Adjacent to the drum that exploded was a drum containing similar chemical constituents which, upon arriving at the scene, was also found to be reacting (drum was bulging and releasing gas).

All processes and operations at the facility were stopped until Friday, April 27th, in order to monitor for other possible releases, collect and contain released waste, and to ensure that there was no additional threat to human health or the environment.

Attached is a chronology of events in response to the incident as well as a list of agencies that were notified.

INCIDENT RESPONSE

A. Chronology of Events (4/25/90 - 4/26/90)

- 2215 - Drum blows up.
- 2220 - Dan Etheredge (BAE) notified by Betts Alarm.
- 2230 - Dan Etheredge (BAE) on site; conversed with Richmond Fire Chief Giaramita.
- 2305 - County Env. Health (Greg Lawler) and Dan (BAE) converse via telephone.
- 2315 - Mike Kara (BAE) on site; conversed with Richmond Fire Chief Giaramita and John Neely (Richmond Police Dept.)
- 000 - Mike and Dan view BAE from Sealy alley w/Fireman Banks.
- 020 - County Env. Health on site - Greg Lawler, Elain Wilson and Jim Hattum.
- 030 - BAE, County Health, Richmond P.D., Richmond F.D. and Co.Co. County Sheriff discuss situation.
- 040 - County Health calls Aerojet Corp.
- 050 - County Health contacts Edward Hammel, retired Aerojet V.P., ((916)791-0248). Hammel refers Health to Ron Wilson; has no phone number for him. Hammel gives Health phone number for David Conklin, Ron's boss ((916)988-0390). No answer. Health calls Aerojet day phone number at (916)355-6900. Security guard answers; doesn't know what to do.
- 100 - Kara tries to call Paul Kyle of Aerojet; security has no phone number for him; security guard flounders.
- 130 - Finally contacted Ron Wilson (he called). Didn't know what it was; said he'd get hold of a rocket scientist and call back. Wilson stated he was afraid this would happen.
- 145 - Jim David of Aerojet calls. States drums are acetone, hydrazine and aluminum oxide. It's a fuel manufactured by Aerojet -- in-house formulation/proprietary information. David admits they've had problems with this stuff.

- 215 - More conversations with Aerojet.
- 230 - Kara and Etheredge enter BAE and find second drum bloated and fuming.
- 255 - County Health orders Aerojet to send rep.
- 300 - Contact Harvi Ruiz and Thomas Oakley (BAE); ask them to report to Richmond F.D.
- 325 - Inspect bloated drum with binoculars from Sealy alley.
- 335 - Harvi and Thomas (BAE) arrive; discuss situation; await Aerojet rep.
- 505 - Dr. Vanderwall of Aerojet on site; mutual agreement that drum needs to be cooled and vented.
- 545 - Dan and Thomas (BAE) suit up in Level B; approach bloated drum with CO₂ fire extinguishers supplied by Chevron. Blast drum w/extinguishers for 15 minutes to cool.
- 550 - Nestor Mejia (IT) on site.
- 615 - Dan (BAE) opens bung venting drum.
- 700 - BAE employees begin arriving.
- 1130 - IT Corp. labor arrives; begin decon
- 1245 - Cal and Fed OSHA on site.
- 1300 - E&E for EPA visit site.

AGENCIES NOTIFIED

4/25/90:

On site: Contra Costa County Health Department
Greg Lawler, Elaine Wilson, Jim Hattum

Richmond Fire Department
Chief Giaramita

Richmond Police Department
John Neely

Contra Costa County Sheriff

4/26/90:

8:00 a.m. Office of Emergency Services
Max Veal
Report #10520

8:30 a.m. National Response Center
Scott Berry
RQ Report #19115

10:45 a.m. Department of Health Services (were unable to get
through sooner)
Bonnie Griffith

11:00 a.m. EPA
John Rusin

11:15 a.m. City of Richmond - Water Pollution Control Plant
Laura Selfridge
Violation #154

11:45 a.m. Coast Guard
Petty Officer Thomas

12:00 p.m. Cal OSHA
William Estakbri
Fed OSHA
Jerry Lee Betro

4:00 p.m. Bay Area Quality Management District
D. Robinson

IV. MATERIALS INVOLVED IN INCIDENT

The two (2) drums in question were manifested (Manifest #89844344) into the facility for storage with the following chemical constituents listed for each drum:

Methyl hydrazine	30 %
Dirt	30 %
Water	40 %

After the accident, the residual contaminants that were left at the bottom of the drum that blew were sampled and analyzed for metals and organics. In addition to the chemical constituents listed above, the attached analytical (Lab ID #71517-3) shows that the drum that blew also contained 215,894 ppm (21.5 %) of aluminum and 3 ppm of toluene. The analytical (Lab ID #71517-3) for the bulging drum indicates no detection of aluminum and 310 ppm of acetone.

Precision Analytical Laboratory, Inc.

4136 LAKESIDE DRIVE, RICHMOND, CA 94806

PHONE (415) 222-3002

FAX (415) 222-1251

CERTIFICATE OF ANALYSIS

STATE LICENSE NO. 211

Received: 04/27/90

Reported: 04/30/90

Job #: 71517

Attn: Michael Kara
Bay Area Environmental
1125 Hensley Street
Richmond, CA. 94801

Project: Aerojet
Matrix: Solid

Analysis Method EPA 6010
Prep Method EPA 3050
mg/kg

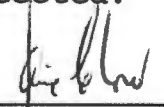
Lab ID #: 71517-3

Client ID: Aerojet

METAL		MDL	% SPIKE RECOVERY
Tl	ND<2.2	2.2	84
As	ND<2.2	2.2	94
Hg	ND<5.0	5.0	84
Se	ND<5.0	5.0	82
Mo	ND<1.0	1.0	92
Sb *	1.0	1.0	106
Zn	26.0	0.15	84
Cd	ND<0.30	0.30	84
Pb	ND<1.1	1.1	88
Co	2.90	0.50	92
Ni	59.0	0.65	88
Cr	5.5	0.15	88
V	77.0	0.10	94
Be	ND<0.025	0.025	88
Cu	7.50	0.10	88
Ag *	ND<0.10	0.10	98
Ba	1.00	0.125	94
Al	215,894	0.70	112

* By Prep Method 3005

MDL: Method detection Limit: Compound below this level would not be detected.


Jaime Chow
Laboratory Director

JC/dc

Precision Analytical Laboratory, Inc.

4136 LAKESIDE DRIVE, RICHMOND, CA 94806

PHONE (415) 222-3002

FAX (415) 222-1251

CERTIFICATE OF ANALYSIS

Received: 04/27/90

Reported: 05/01/90

Job #: 71517

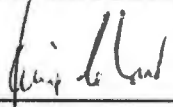
Attn: Michael Kara
Bay Area Environmental
1125 Hensley Street
Richmond, CA. 94801

Project: Aerojet
Matrix: Solid

EPA METHOD 8240
PURGEABLE ORGANICS
mg/kg

Lab ID:	71517-3	
<u>Client ID:</u>	<u>Aerojet</u>	<u>MDL</u>
Chloromethane	ND	8
Bromomethane	ND	7
Vinyl chloride	ND	9
Chloroethane	ND	7
Methylene chloride	ND	10
Trichlorofluoromethane	ND	6
1,1-dichloroethene	ND	4
1,1-dichloroethane	ND	5
Trans-1,2 dichloroethene	ND	4
Chloroform	ND	4
1,2 dichloroethane	ND	3
1,1,1-trichloroethane	ND	3
Carbon tetrachloride	ND	4
Bromodichloromethane	ND	4
1,2-dichloropropene	ND	3
Cis-1,3-dichloropropene	ND	3
Trichloroethene	ND	3
Benzene	ND	2
Dibromochloromethane	ND	2
1,1,2-trichloroethane	ND	4

ND = Not Detected at or above limit of detection.



Jaime Chow
Laboratory Director

JC/dc

Precision Analytical Laboratory, Inc.

4136 LAKESIDE DRIVE, RICHMOND, CA 94806

PHONE (415) 222-3002 FAX (415) 222-1251

Bay Area Environmental
Job No.: 71517

Page 2 of 2

Project: Aerojet

Matrix: Solid

<u>Compound</u>	<u>Concentration</u>	<u>Limit of Detection</u>
Trans 1,3-dichloropropene	ND	3
2-chloroethyl vinyl ether	ND	5
Bromoform	ND	3
1,1,2,2-tetrachloroethane	ND	5
Tetrachloroethene	ND	2
Toluene	3	2
Chlorobenzene	ND	2
Ethylbenzene	ND	4
1,3 Dichlorobenzene	ND	3
1,2 Dichlorobenzene	ND	3
1,4 Dichlorobenzene	ND	3
Dichlorodifluoromethane	ND	4
Trichlorofluoromethane	ND	3
Freon 113	ND	4
M + P Xylene	ND	3
O-Xylene	ND	3
Acetone	ND	22
Carbon Disulfide	ND	4
4 Methyl-2-Pentanone	ND	14
2 Hexanone	ND	10
Styrene	ND	2
2-Butanone	ND	10

ND = Not Detected at or above limit of detection.

Precision Analytical Laboratory, Inc.

4136 LAKESIDE DRIVE, RICHMOND, CA 94806

PHONE (415) 222-3002

FAX (415) 222-1251

CERTIFICATE OF ANALYSIS

STATE LICENSE NO. 211

Received: 04/27/90

Reported: 04/30/90

Job #: 71517

Attn: Michael Kara
Bay Area Environmental
1125 Hensley Street
Richmond, CA. 94801

Project: Aerojet

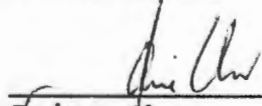
Matrix: Aqueous

Analysis Method EPA 6010
Prep Method EPA 3010
mg/l

Lab ID #:	71517-1	71517-2		
Client ID:	04/26/90	04/26/90		
	BAE-4	BAE		
METAL			MDL	% SPIKE RECOVERY
Tl	ND<0.176	ND<0.176	0.176	90
As	ND<0.176	ND<0.176	0.176	112
Hg	ND<0.400	ND<0.400	0.400	104
Se	ND<0.400	ND<0.400	0.400	112
Mo	ND<0.080	ND<0.080	0.080	102
Sb *	ND<0.080	ND<0.080	0.080	84
Zn	0.70	0.17	0.012	82
Cd	ND<0.024	0.024	0.012	102
Pb	ND<0.088	0.034	0.088	98
Co	ND<0.040	0.09	0.040	90
Ni	0.70	0.70	0.050	96
Cr	0.08	ND<0.012	0.012	98
V	0.05	ND<0.008	0.008	86
Be	ND<0.002	ND<0.002	0.002	108
Cu	0.10	0.03	0.008	92
Ag *	ND<0.008	ND<0.008	0.008	102
Ba	0.09	ND<0.010	0.010	90
Al	200	ND<0.014	0.014	92

* By Prep Method 3005

MDL: Method detection Limit: Compound below this level would not be detected.


Jaime Chow
Laboratory Director

JC/dc

Precision Analytical Laboratory, Inc.

4136 LAKESIDE DRIVE, RICHMOND, CA 94806

PHONE (415) 222-3002

FAX (415) 222-1251

CERTIFICATE OF ANALYSIS

Received: 04/27/90

Reported: 05/01/90

Job #: 71517

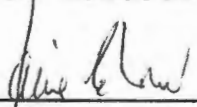
Attn: Michael Kara
Bay Area Environmental
1125 Hensley Street
Richmond, CA. 94801

Project: Aerojet
Matrix: Aqueous

EPA METHOD 8240
PURGEABLE ORGANICS
ug/l

Lab ID:	71517-2	
<u>Client ID:</u>	<u>04/26/90 BAE</u>	<u>MDL</u>
Chloromethane	ND	400
Bromomethane	ND	350
Vinyl chloride	ND	450
Chloroethane	ND	350
Methylene chloride	ND	500
Trichlorofluoromethane	ND	300
1,1-dichloroethene	ND	200
1,1-dichloroethane	ND	250
Trans-1,2 dichloroethene	ND	200
Chloroform	ND	200
1,2 dichloroethane	ND	150
1,1,1-trichloroethane	ND	150
Carbon tetrachloride	ND	200
Bromodichloromethane	ND	200
1,2-dichloropropene	ND	150
Cis-1,3-dichloropropene	ND	150
Trichloroethene	ND	150
Benzene	ND	100
Dibromochloromethane	ND	100
1,1,2-trichloroethane	ND	200

ND = Not Detected at or above limit of detection.


Jaime Chow
Laboratory Director

JC/dc

Precision Analytical Laboratory, Inc.

4136 LAKESIDE DRIVE, RICHMOND, CA 94806

PHONE (415) 222-3002

FAX (415) 222-1251

Bay Area Environmental

Page 2 of 2

Job No.: 71517

Project: Aerojet

Matrix: Aqueous

<u>Compound</u>	<u>Concentration</u>	<u>Limit of Detection</u>
Trans 1,3-dichloropropene	ND	150
2-chloroethyl vinyl ether	ND	250
Bromoform	ND	150
1,1,2,2-tetrachloroethane	ND	250
Tetrachloroethene	ND	100
Toluene	ND	100
Chlorobenzene	ND	100
Ethylbenzene	ND	200
1,3 Dichlorobenzene	ND	150
1,2 Dichlorobenzene	ND	150
1,4 Dichlorobenzene	ND	150
Dichlorodifluoromethane	ND	200
Trichlorofluoromethane	ND	150
Freon 113	ND	200
M + P Xylene	ND	150
O-Xylene	ND	150
Acetone	310,000	310
Carbon Disulfide	ND	200
4 Methyl-2-Pentanone	ND	700
2 Hexanone	ND	500
Styrene	ND	100
2-Butanone	ND	500

ND = Not Detected at or above limit of detection.

V. EXTENT OF INJURIES

At the time of the incident, the facility was locked and secured and there were no personnel on site. There were, however, minimal injuries incurred by three (3) Sealy (the facility next door) employees and two (2) consultants that were outside and on the other side of the fence at the time of the accident. The following information was received from John Doberneck, the Sealy Plant Manager:

- 1) Three (3) Sealy employees and two (2) consultants were taken to Brookside Hospital by ambulance.
- 2) All were administered first aid and immediately released.
- 3) One consultant missed five (5) days of work.
- 4) Symptoms were eye, ear, nose, throat irritation and headaches.

VI. HAZARD(S) ASSESSMENT

Attached are the material safety data sheets for (1) methyl hydrazine and (2) aluminum powder. They contain health hazard data for the drums that reacted as well as some of the drums still left in storage.



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05:21 72/70

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Telex: 26 843 Aldrich MI
FAX: (414) 273-4979

ATTN: SAFETY DIRECTOR
AEROJET GENERAL
HWY 50 & AEROJET RD
REC BLDG 2022
NIMBUS CA 95670
O ICEOMO/ 2004/9410

DATE: 09/05/89
CUST # 100501 P.O. # T333525PN

ATCMS# 1333

M A T E R I A L S A F E T Y D A T A S H E E T PAGE: 1

IDENTIFICATION

PRODUCT # M5000-1 NAME: METHYLHYDRAZINE, 99%
CAS # 60-34-4
MF: CH₆N₂

SYNONYMS

HYDRAZOMETHANE * METHYLHYDRAZINE * 1-METHYLHYDRAZINE *
METHYLHYDRAZINE (ACGIH, OSHA) * METYLOHYDRAZYNA (POLISH) * MMH *
MONOMETHYLHYDRAZINE * MONOMETHYLHYDRAZINE (OSHA) * RCRA WASTE NUMBER
P068 * UN 1244 (DOT) *

TOXICITY HAZARDS

RTECS # MV5600000

HYDRAZINE, METHYL-

TOXICITY DATA

ORL-RAT LD50:32 MG/KG
IHL-RAT LC50:34 PPM/4H
SKN-RAT LD50:183 MG/KG
IPR-RAT LD50:21 MG/KG
SCU-RAT LD50:35 MG/KG
IVN-RAT LD50:17 MG/KG
ORL-MUS LD50:29 MG/KG
IHL-MUS LC50:56 PPM/4H
IPR-MUS LD50:15 MG/KG
SCU-MUS LD50:25 MG/KG
IVN-MUS LD50:33200 UG/KG
IHL-DOG LC50:96 PPM/1H
IVN-DOG LD50:12 MG/KG
IHL-MKY LC50:82 PPM/1H
SKN-RBT LD50:95 MG/KG
IVN-RBT LD50:12 MG/KG
SKN-GPG LD50:48 MG/KG
ORL-HAM LD50:22 MG/KG
IHL-HAM LC50:143 PPM/4H
SKN-HAM LD50:239 MG/KG
IPR-HAM LD50:21 MG/KG

XAWPA2 CWL 2-10,58
AMRL** TR-67-137,67
CTOXAO 4,435,71
CTOXAO 4,435,71
BJCAA1 30,429,74
CTOXAO 4,435,71
NTIS** AD-A125-539
AMHAB 12,609,55
PSEBAA 124,172,67
BJCAA1 30,429,74
MEPAAX 24,71,73
AIHAAP 31,667,70
PSEBAA 131,226,69
AIHAAP 31,667,70
PSEBAA 131,226,69
PSEBAA 131,226,69
PSEBAA 131,226,69
CTOXAO 4,435,71
AMHAB 12,609,55
CTOXAO 4,435,71
CTOXAO 4,435,71

REVIEWS, STANDARDS, AND REGULATIONS

ACGIH TLV-SUSPECTED CARCINOGEN 85INA8 5,398,86
ACGIH TLV-CL 0.2 PPM (SKIN) 85INA8 5,398,86
MSHA STANDARD: AIR-CL 0.2 PPM (0.35 MG/M³) (SKIN) OTLVS* 3,174,71
OSHA PEL: CL 0.2 PPM (0.35 MG/M³) (SKIN) FEREAC 54,2923,89
OSHA PEL FINAL: CL 0.2 PPM (0.35 MG/M³) (SKIN) FEREAC 54,2923,89
NIOSH REL TO HYDRAZINES-AIR: CL 0.08 MG/M³/2H MMWR** 37(S-7), 16,88
EPA GENETOX PROGRAM 1988, POSITIVE: HISTIDINE REVERSION-AMES TEST;
TRP REVERSION
EPA GENETOX PROGRAM 1988, POSITIVE/LIMITED: CARCINOGENICITY-MOUSE/RAT
EPA GENETOX PROGRAM 1988, NEGATIVE: RODENT DOMINANT LETHAL; IN VITRO
UDS-HUMAN FIBROBLAST
EPA GENETOX PROGRAM 1988, NEGATIVE: S CEREVISIAE GENE CONVERSION
EPA TSCA CHEMICAL INVENTORY, 1986
MEETS CRITERIA FOR PROPOSED OSHA MEDICAL RECORDS RULE FEREAC 47,30420,
82

TARGET ORGAN DATA

SENSE ORGANS AND SPECIAL SENSES (OLFACTION TUMORS)
SENSE ORGANS AND SPECIAL SENSES (MIOSIS)



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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 1

CATALOG # M5000-1

NAME: METHYLHYDRAZINE, 99%

SENSE ORGANS AND SPECIAL SENSES (CONJUNCTIVA IRRITATION)
BEHAVIORAL (SOMNOLENCE)
BEHAVIORAL (CONVULSIONS OR EFFECT ON SEIZURE THRESHOLD)
BEHAVIORAL (EXCITEMENT)
LUNGS, THORAX OR RESPIRATION (TUMORS)
GASTROINTESTINAL (NAUSEA OR VOMITING)
LIVER (TUMORS)
ENDOCRINE (ADRENAL CORTEX HYPERPLASIA)
BLOOD (LEUKEMIA)
SKIN AND APPENDAGES (HAIR)
EFFECTS ON FERTILITY (POST-IMPLANTATION MORTALITY)
SPECIFIC DEVELOPMENTAL ABNORMALITIES (EYE, EAR)
TUMORIGENIC (CARCINOGENIC BY RTECS CRITERIA)
TUMORIGENIC (NEOPLASTIC BY RTECS CRITERIA)
TUMORIGENIC (EQUIVOCAL TUMORIGENIC AGENT BY RTECS CRITERIA)

ONLY SELECTED REGISTRY OF TOXIC EFFECTS OF CHEMICAL SUBSTANCES (RTECS)
DATA IS PRESENTED HERE. SEE ACTUAL ENTRY IN RTECS FOR COMPLETE INFORMATION

----- HEALTH HAZARD DATA -----

ACUTE EFFECTS

MAY BE FATAL IF INHALED, SWALLOWED, OR ABSORBED THROUGH SKIN.

CAUSES BURNS.

MATERIAL IS EXTREMELY DESTRUCTIVE TO TISSUE OF THE MUCOUS MEMBRANES
AND UPPER RESPIRATORY TRACT, EYES AND SKIN.

INHALATION MAY BE FATAL AS A RESULT OF SPASM, INFLAMMATION AND EDEMA
OF THE LARYNX AND BRONCHI, CHEMICAL PNEUMONITIS AND PULMONARY EDEMA.
SYMPTOMS OF EXPOSURE MAY INCLUDE BURNING SENSATION, COUGHING,
WHEEZING, LARYNGITIS, SHORTNESS OF BREATH, HEADACHE, NAUSEA AND
VOMITING.

MAY CAUSE ALLERGIC RESPIRATORY AND SKIN REACTIONS.

EXPOSURE CAN CAUSE:

DAMAGE TO THE LIVER
DAMAGE TO THE KIDNEYS

BLOOD EFFECTS

CHRONIC EFFECTS

CARCINOGEN.

MAY ALTER GENETIC MATERIAL.

TARGET ORGAN(S):

BLOOD

FIRST AID

IN CASE OF CONTACT, IMMEDIATELY FLUSH EYES OR SKIN WITH COPIOUS
AMOUNTS OF WATER FOR AT LEAST 15 MINUTES WHILE REMOVING CONTAMINATED
CLOTHING AND SHOES.

ASSURE ADEQUATE FLUSHING OF THE EYES BY SEPARATING THE EYELIDS
WITH FINGERS.

IF INHALED, REMOVE TO FRESH AIR. IF NOT BREATHING GIVE ARTIFICIAL
RESPIRATION. IF BREATHING IS DIFFICULT, GIVE OXYGEN.

CALL A PHYSICIAN.

REMOVE AND WASH CONTAMINATED CLOTHING PROMPTLY.

----- PHYSICAL DATA -----

BOILING POINT: 87 C

SPECIFIC GRAVITY: 0.866

VAPOR DENSITY: 1.6

VAPOR PRESSURE: 37.5 MM @ 20 C
206.0 MM @ 55 C

APPEARANCE: COLORLESS LIQUID



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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 3

CATALOG # M5000-1

NAME: METHYLHYDRAZINE, 99%

----- FIRE AND EXPLOSION HAZARD DATA -----

AUTO IGNITION TEMP.: 385 F
LOWER EXPLOSION LEVEL: 2.5%
UPPER EXPLOSION LEVEL: 97%
FLASH POINT: 70 F

EXTINGUISHING MEDIA

WATER SPRAY.

CARBON DIOXIDE, DRY CHEMICAL POWDER, ALCOHOL OR POLYMER FOAM.

SPECIAL FIRE FIGHTING PROCEDURES

WEAR SELF-CONTAINED BREATHING APPARATUS AND PROTECTIVE CLOTHING TO PREVENT CONTACT WITH SKIN AND EYES.

UNUSUAL FIRE AND EXPLOSION HAZARDS

FLAMMABLE LIQUID.

VAPOR MAY TRAVEL CONSIDERABLE DISTANCE TO SOURCE OF IGNITION AND FLASH BACK.

UNDER FIRE CONDITIONS, MATERIAL MAY DECOMPOSE TO FORM FLAMMABLE AND/OR EXPLOSIVE MIXTURES IN AIR.
CATCHES FIRE IF EXPOSED TO AIR.

----- REACTIVITY DATA -----

INCOMPATIBILITIES

OXIDIZING AGENTS

OXYGEN

PEROXIDES

HAZARDOUS COMBUSTION OR DECOMPOSITION PRODUCTS

CARBON MONOXIDE, CARBON DIOXIDE

NITROGEN OXIDES

----- SPILL OR LEAK PROCEDURES -----

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED

EVACUATE AREA.

SHUT OFF ALL SOURCES OF IGNITION.

WEAR SELF-CONTAINED BREATHING APPARATUS, RUBBER BOOTS AND HEAVY RUBBER GLOVES.

ABSORB ON SAND OR VERMICULITE AND PLACE IN CLOSED CONTAINERS FOR DISPOSAL.

VENTILATE AREA AND WASH SPILL SITE AFTER MATERIAL PICKUP IS COMPLETE.

WASTE DISPOSAL METHOD

BURN IN A CHEMICAL INCINERATOR EQUIPPED WITH AN AFTERBURNER AND SCRUBBER BUT EXERT EXTRA CARE IN IGNITING AS THIS MATERIAL IS HIGHLY FLAMMABLE.

OBSERVE ALL FEDERAL, STATE & LOCAL LAWS.

--- PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE ---

WEAR APPROPRIATE NIOSH/MSHA-APPROVED RESPIRATOR, CHEMICAL-RESISTANT GLOVES, SAFETY GOGGLES, OTHER PROTECTIVE CLOTHING.

USE ONLY IN A CHEMICAL FUME HOOD.

SAFETY SHOWER AND EYE BATH.

FACESHIELD (8-INCH MINIMUM).

RUBBER APRON.

DO NOT BREATHE VAPOR.

DO NOT GET IN EYES, ON SKIN, ON CLOTHING.

AVOID PROLONGED OR REPEATED EXPOSURE.

READILY ABSORBED THROUGH SKIN.

WASH THOROUGHLY AFTER HANDLING.

HIGHLY TOXIC.

CORROSIVE.

CARCINOGEN.

Belgium
Aldrich Chemie NV/SA
20 Lombardstraat 140, 20
B-1050 Brussels
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Telex: 81232 Aldrich B
Fax: 02 7476616

France
Aldrich Chimie S.A.
37 Fosse des Truies
F-47000 Sarlat
Telephone (05) 327010
Telex: 880078 Aldrich F
Fax: 05 791383

Italy
Aldrich Chimica S.r.l.
Via Paris, Torino 6
20127 Milan
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Fax: 02 2696301

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04/24 12:58

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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 1

CATALOG # M5000-1

NAME: METHYLHYDRAZINE, 99%

MUTAGEN.
KEEP TIGHTLY CLOSED.
KEEP AWAY FROM HEAT, SPARKS, AND OPEN FLAME.
AIR SENSITIVE
HYGROSCOPIC
HANDLE AND STORE UNDER NITROGEN.
STORE IN A COOL DRY PLACE.

----- ADDITIONAL PRECAUTIONS AND COMMENTS -----

NOT APPLICABLE

----- REGULATORY INFORMATION -----

THIS PRODUCT IS SUBJECT TO SARA SECTION 313 REPORTING REQUIREMENTS.

THE ABOVE INFORMATION IS BELIEVED TO BE CORRECT BUT DOES NOT PURPORT TO BE ALL INCLUSIVE AND SHALL BE USED ONLY AS A GUIDE. ALDRICH SHALL NOT BE HELD LIABLE FOR ANY DAMAGE RESULTING FROM HANDLING OR FROM CONTACT WITH THE ABOVE PRODUCT. SEE REVERSE SIDE OF INVOICE OR PACKING SLIP FOR ADDITIONAL TERMS AND CONDITIONS OF SALE.



AEROJET SOLID PROPULSION COMPANY MATERIAL SAFETY DATA SHEET

I PRODUCT IDENTIFICATION		DATE 7/88	REV NO 4
MANUFACTURER'S NAME Alcoa		EMERGENCY TELEPHONE NO (412) 553-4001	
ADDRESS Powder Division, P. O. Box 472, Rockdale, TX 76567			
NAME Aluminum Powder			
SYNONYMS None			
TSCA NO (CAS NO) 7429-90-5		FORMULA AL	
II HAZARDOUS INGREDIENTS AND GENERAL COMMENTS			
Contents	CAS No.	% Typical	ACGIH TLV OSHA PEL
Aluminum	7429-90-5	99.7	5 mg/M ³ 5 mg/M ³
Iron	7439-89-6	0.2	
Silicon	7440-21-3	0.1	
Aluminum powder will react with chlorinated solvents such as 1,1,1-Trichloroethane. Gases are generated and great pressures may be achieved possibly rupturing containers explosively.			
ALTERNATE MANUFACTURER: Alcan Powders and Pigments 901 Lehigh Avenue Union, NJ 07083 Phone: (201) 353-4600			
III PHYSICAL DATA			
NA - NOT AVAILABLE			
BOILING POINT, °C (°F) TORR (mm Hg)	2450 °C	MELTING POINT, °C (°F)	1195-1215 °F (646-657 °C)
SPECIFIC GRAVITY (H ₂ O 1)	0.8 - 1.3 g/cm ³	VAPOR PRESSURE (TORR) AT TEMP.	Nil
VAPOR DENSITY (AIR 1)	NP	SOLUBILITY IN H ₂ O BY WT	Insoluble
% VOLATILES BY VOLUME	0	EVAPORATION RATE	0
APPEARANCE AND ODOR Varies from dull gray to metallic silvery color.			
IV FIRE AND EXPLOSION DATA			
FLASH POINT (TEST METHOD)	Bulk Al not combustible	AUTOIGNITION TEMPERATURE	650 °C (layered)
FLAMMABLE LIMITS IN AIR, % BY VOLUME		LOWER	UPPER
		>0.04 O ₂ /FT ³	NA
EXTINGUISHING MEDIA	Smothering agents only. Do not use water or halon or fire extinguisher rated for Class A, B, or C fires.		
SPECIAL FIRE FIGHTING PROCEDURES	Firefighters should wear self-contained breathing apparatus and protective clothing. Use extreme care to prevent dust cloud formation. Use gentle surface application of Class D extinguishing agent or dry inert		
UNUSUAL FIRE AND EXPLOSION HAZARD	granular material (e.g. sand) to cover and ring the burning powder. Do not disturb the burning powder or cause mixing of the agent with burning powder. Do not disturb the powder until completely cool.		
V HEALTH HAZARD INFORMATION			
Carcinogenicity: (NTP) No (IARC) No (OSHA) No			
EFFECTS OF OVEREXPOSURE	ACUTE		
	INHALATION: High concentrations can cause irritation.		
	SKIN CONTACT: Repeated skin contact can cause irritation.		
	EYE CONTACT: High concentrations can cause irritation.		
CHRONIC	Long term exposure may lead to pulmonary fibrosis. Symptoms may be shortness of breath, coughing and weakness.		
POTENTIAL ROUTE(S) OF ENTRY			
EYES SKIN <input checked="" type="checkbox"/> INHALATION INGESTION			

V HEALTH HAZARD INFORMATION (CONT)

EMERGENCY AND FIRST AID PROCEDURES

EYES Wash with water at least 15 minutes. Report to Medical.

SKIN Wash with soap and water.

INHALATION Remove to fresh air. Report to Medical if symptoms appear.

INGESTION Report to Medical.

VI REACTIVITY DATA

STABILITY (STABLE/UNSTABLE)

Stable

CONDITIONS TO AVOID

High humidity. Oxidizes at a rate dependent on temperature.

INCOMPATIBILITY (MATERIALS TO AVOID) Reacts violently with strong oxidizers and halogenated compounds including halogenated fire extinguishing agents). Generates hydrogen and heats slowly in contact with water, acids or bases.

HAZARDOUS DECOMPOSITION PRODUCTS

Liberates hydrogen when exposed to water or acids.

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION

Will not occur.

VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED

Avoid all ignition sources around spill area. Prohibit smoking. Do not use water for spill clean-up. Avoid dusting of powder to the greatest extent possible. Sweep spilled powder with natural bristle broom (push type recommended). Pick up material with non-sparking shovel. Place carefully in dry, water-tight containers. Seal containers. After complete clean-up by sweeping, area may be washed down with copious quantities of water.

NEUTRALIZING CHEMICALS

None

WASTE DISPOSAL METHOD

Contact Central Waste Management (Ext. 3144/2045) for current disposal methods.

VIII SPECIAL PROTECTION INFORMATION

VENTILATION REQUIREMENTS

For small quantities general room ventilation is adequate. For larger quantities or dusty areas, use local exhaust. Use with adequate explosion-proof ventilation.

SPECIFIC PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY

For small quantities, in well-ventilated areas, no respirator required. For larger quantities use cartridge respirator with dust filter (such as MSA type F or AO R-30).

EYES

Use goggles when dust is excessive

GLOVES

Cotton or rubber

OTHER CLOTHING AND EQUIPMENT

Coveralls or shop coat

IX SPECIAL PRECAUTIONS

PRECAUTIONARY STATEMENTS

Humidity should be 30-55% and/or under a nitrogen atmosphere when dispensing. All dispensing and handling equipment to be grounded. Use spark-proof tools. Aluminum powder may be explosive when dispersed in air. Even a minor dust cloud can explode violently.

OTHER HANDLING AND STORAGE REQUIREMENTS

Store in well ventilated dry area. Storage and dispensing areas must not have sprinkler systems. Avoid contact with chlorinated solvents. Keep work area clean and neat. Avoid dust build-up. Cover and reseal partially empty containers. Do not store with combustible materials. Smoking is prohibited.

VII. DISPOSITION OF THE RECOVERED MATERIAL

Attached is a tracking sheet showing the disposition of all the drums which came in on the shipment with the drums that reacted. The drums received were in two shipments totaling 66 drums. Currently there are 14 drums left on site.

The disposition of the two drums that reacted is as follows:

A. Drum that "blew"

All of the contents of the drum were discharged inside the bay before going through the roof of the storage structure. The drum carcass was found clean while the bottom panel of the drum, which was left on the pallet, contained some residue. Both the drum carcass and bottom panel were overpacked into an 85-gallon salvage drum which is still held at the facility.

B. "Bulging" drum

This drum has been overpacked on ice into an 85-gallon salvage drum and is being monitored 24 hours a day for temperature, combustibility, as well as ammonia and hydrazine air vapors. This drum is also still being held at the facility.

International Technology has been contracted by Aerojet-General to submit a remedial plan to Department of Health for the final disposition of this drum.

The following drums were created in the decontamination and cleanup process of the incident:

16-55 DM Hazardous Waste Liquid, N.O.S. ORM-E
NA 9189 (Water contaminated with methyl hydrazine, aluminum)

3-55 DM Hazardous Waste solid, N.O.S. ORM-E
NA 9189 (Solid-a-Sorb contaminated with methyl-hydrazine, aluminum)

1-55 DM Hazardous Waste Solid, N.O.S. ORM-E
NA 9189 (Protective clothing and debris from methyl hydrazine spill clean up.)

All of the drums generated from the cleanup are in the process of being profiled and scheduled for shipment from the facility.

DRUM INVENTORY

Job 106	IT ARC Drum #	Incoming Manifest	Outgoing Manifest	Notes
001	15	89844344a	At BAE	Flammable poison
002	21	89844344a	At BAE	Flammable poison
003	35	89844344a	Evergreen 90137718	Transferred w/117-013
004	10	89844344a	CWM 90137730	Alkaline
005	12	89844344a	At BAE	Flammable
006	11	89844344a	At BAE	Flammable, corrosive
007	6	89844344a	At BAE	Flammable, corrosive
008	39	89844344c	Vaporized @ BAE	Empty container remaining
009	20	89844344c	At BAE	Reacted drum
010		89844344d	ESI 90137719	Soil w/hydrocarbons
011		89844344d	ESI 90137719	Soil w/hydrocarbons
012		89844344d	ESI 90137719	Soil w/hydrocarbons
013		89844344d	ESI 90137719	Soil w/hydrocarbons
014		89844344d	ESI 90137719	Soil w/hydrocarbons
015		89844344d	Evergreen 90137718	Transferred w/117-013
016		89844346a	CWM 90137730	Alkaline
017		89844346a	CWM 90137730	Alkaline
018		89844346a	CWM 90137730	Alkaline

Job 106	IT ARC Drum #	Incoming Manifest	Outgoing Manifest	Notes
019		89844346a	CWM 90137730	Alkaline
020		89844346a	CWM 90137730	Transferred w/106-016 - Alkaline
021		89844346a	CWM 90137730	Alkaline
022		89844346a	CWM 90137730	Alkaline
023		89844346b	CWM 90137730	Alkaline
024	23	89844346b	At BAE	Alkaline liquid w/ammon- iated odor.
025	41	89844347a	Aptech 90137722/28b	Transferred w/117-038
026		89844348a	Aptech 90137722/28b	Waste oxidizer Potassium permanganate
027		89844348a	Aptech 90137722/28b	Waste oxidizer Potassium permanganate
028		89844348a	Aptech 90137722/28b	Waste oxidizer Potassium permanganate

Job 117	IT ARC Drum #	Incoming Manifest	Outgoing Manifest	Notes
001	66	89844354a	Aptech 90137722/11a	Sulfuric and water
002	74	89844354b	Evergreen 90137718	Transferred w/117-013
003	50	89844354b	Evergreen 90137718	Transferred w/117-032
004	63	89844354b	Evergreen 90137718	Transferred w/117-034
005	36	89844354b	CWM 90137734	Oily solid
006	60	89844354b	CWM 90137734	Oily solid
007	57	89844354c	At BAE	Solvent & water
008	38	89844354d	CWM 90137768	Roll off/silicate dessicant
009	54	89844350a	Aptech 90137722/11d	Came in CRWO (other organic solids); soil w/solvents; have analysis - Precision Analytical
010	46	89844350b	SS 90137703	Transferred w/117-014
011	69	89844350c	Aptech 9013772/11a	Sulfuric and water
012	67	89844351a	CWM 90137768	Debris, sorbents - roll off
013	53	89844351b	Evergreen 90137718	Oil & water
014	71	89844351c	SS 90137703	Chlorinated solvent
015	77	89844351d	At BAE	Sodium silicate
016	68	89844358a	CWM 90137768	Debris/roll off
017	59	89844358b	SS 90137703	Solvents

Job 117	IT ARC Drum #	Incoming Manifest	Outgoing Manifest	Notes
018	48	89844358c	CWM 90137768	Silicate dessicant/ roll off
019	78	89844355a	Aptech 9013772/11d	Came in CRWO (other organic solids) soil w/solvents; have analysis
020	65	89844355a	Aptech 90137722	Transferred w/117-009
021	51	89844355a	At BAE	Resin solid
022	47	89844355a	At BAE	Soil oxidizer (solvent odor)
023	75	89844355a	CWM 90137768	Cement grout - roll off
024	55	89844355a	At BAE	Soil w/methylene chloride odor
025	70	89844355a	CWM 90137768	Rags/debris w/hydraulic fluid roll off
026	49	89844355a	At BAE	Ammoniated paint
027	64	89844355a	Aptech 90137722	Transferred w/117-019
028	58	89844355a	CWM 90137730	Alkaline liquid
029	52	89844355b	CWM 90137730	Alkaline
030	56	89844355c	Evergreen	Transferred w/117-032
031	73	89844355c	CWM 90137734	Transferred w/117-005
032	62	89844355c	Evergreen 90137718	Oil
033	61	89844355d	Aptech 90137722/11a	Hydrochloric acid
034	29	89844345a	Evergreen 90137718	Oil & water
035	25	89844345a	CWM 90137734	Soil w/hydrocarbons

Job 117	IT ARC Drum #	Incoming Manifest	Outgoing Manifest	Notes
036	31	89844345a	CWM 90137734	Soil w/hydrocarbons
037	26	89844345a	CWM 90137734	Soil w/hydrocarbons
038	76	89844345a	Aptech 90137722/28b	Waste oxidizer

incid2.lst

COPIES OF THIS REPORT HAVE BEEN SENT TO THE FOLLOWING AGENCIES:

- 1) Regional Administrator
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105
- 2) U.S. Department of Labor
Occupational Safety and Health Administration
105 El Camino Plaza
Sacramento, CA 95815
- 3) State of California
Department of Industrial Relations
Division of Occupational Safety and Health
1465 Enea Circle Bldg. E, Suite 900
Concord, CA 94520
- 4) Contra Costa County Health Dept
Environmental Health Division
4333 Pacheco Blvd.
Martinez, CA 94533
- 5) State of California
Regional Water Quality Control Board
1800 Harrison St. Room 700
Oakland, CA 94607
- 6) California Department of Fish and Game
Region III, P.O. Box 47
Yountville, CA 94559
- 7) Bay Area Quality Management District
939 Ellis Street
San Francisco, CA 94109

- 8) City of Richmond
Water Pollution Control Plant
601 Canal Boulevard
Richmond, CA 94804
- 9) Richmond Fire Department
330 25th Street
Richmond, CA 94804
- 10) United States Coast Guard
MSO, Security and Environmental Protection
MSO Bldg. No 14
Coast Guard Island
Alameda, CA 94501



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

January 11, 1989

Jim McCarmon
Department of Health Services
Toxic Substances Control Division
State of California
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

ICF TECHNOLOGY	
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER <input checked="" type="checkbox"/> _____	DATE _____

Dear Jim:

On Friday, January 6, 1989, a non-reportable quantity of hazardous waste was released at our facility at 1125 Hensley Street, Richmond, CA. Our crew was in the process of loading drums on a flatbed truck for shipment to another facility. As the crew removed a drum from a pallet and rolled it off the edge and down onto the deck of the truck, the bottom of the poly drum cracked and the contents of one drum of nitric acid was released on the deck of the truck.

The crew managed to roll the drum over on its side and this action stopped the release of acid. A total of approximately 25 gallons was released from the drums. The crew donned their safety gear and proceeded to cleanup the spill.

We instructed our non-operations staff of a potential emergency and instituted our contingency plan. Quintin Young coordinated the initial communications with the businesses in the area. He also called the Contra Costa Office of Emergency Services.

The Federal Reportable Quantity Standard for nitric acid is 1,000 pounds. The amount released was approximately 250 pounds. Therefore, the State was not notified at the time of the spill because it was below the RQ.

I coordinated the cleanup of the material on the truck and around the immediate area of the truck. The spill occurred within the containment area for hazardous waste loading and no material was released off-site.

The driver of the truck was standing near the edge of the truck when the drum failed. He was splashed slightly about the chest and arms as the acid was released. We administered First Aid at the facility and then took the driver, Joe Garcia, of Stamco, to Kaiser Emergency for follow-up treatment. He was seen and released by Kaiser. He suffered some minor burns but felt fine and drove his truck out of the yard the same afternoon.

Page Two
J. McCammon
January 11, 1989

The Department was originally notified by telephone of the incident on Monday, January 9, 1989, by Tom Meichtry. This report is a follow-up to the telephone conversation. The material spilled originated from DRMO at Alameda Naval Air Station. Rollins Environmental was the contractor that brought the material to our facility. The poly drums used to package this waste stream are provided by the military to Rollins. These drums have failed at other facilities and Rollins has been informed that BAE will not accept these drums for storage in the future.

If there are any questions regarding this release, please contact Tom Meichtry or myself at (415) 233-8001. Thank you for your continued support of our operations,.

Sincerely,



David Burton
Operations Manager

db/br

Enclosure(s) Incoming Manifest from DRMO
Quintin Young Memo on Telephone Calls
Federal RQ Table
Medical Information on Driver
Rollins Memo

Our Facility EPA No. is CAT 080 014079

DLA-200-88D-0077

0.0.207,208

Instructions on the Back

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address ENVIRONMENTAL PROTECTION (CODE 01-1) NAVAL AIR STATION ALAMEDA ALAMEDA, CA 94501-5000		CA 2170023236		A. State Manifest Document Number 88055240		
4. Generator's Phone (415) 569-4731		ATTN: RANDY CATE		B. State Generator's ID		
5. Transporter 1 Company Name STANCO		6. US EPA ID Number CA 01063547996		C. State Transporter's ID 404741		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone ALN 916-904791800-321-030		
9. Designated Facility Name and Site Address BAY AREA ENVIRONMENTAL 1125 HENSLEY RICHMOND, CA 94804		10. US EPA ID Number CA 01080034079		E. State Transporter's ID F. Transporter's Phone G. State Facility's ID H. Facility's Phone 415-133-8001		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. WASTE CORROSIVE LIQUID, N.O.S. (D002) CORROSIVE MATERIAL UN1760		0114	DF	0.07100 G	State 711 EPA/Other D002	
b. WASTE CORROSIVE LIQUID, N.O.S. (D002) CORROSIVE MATERIAL UN1760		003	DA	0.0150 G	State 722 EPA/Other D002	
c.					State EPA/Other	
d.					State EPA/Other	
J. Additional Descriptions for Materials Listed Above a) TRISAUO, MTRICAUO b) CLEANING SOLUTIONS ALKALINE		K. Handling Codes for Wastes Listed Above a. b. c. d.				
15. Special Handling Instructions and Additional Information CAUTION: USE ADEQUATE PROTECTIVE CLOTHING AND RESPIRATORY PROTECTION WHEN HANDLING						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name HENRY YOUNG Signature Henry Young Month Day Year 11 30 88 Olivia Austria Olivia Austria 11 13 88						
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name LEE BROWN (T. STA-1-11-12-88) Signature Lee Brown (T. Sta-1-11-12-88) Month Day Year						
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year						
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Lee Wheeler Signature Lee Wheeler Month Day Year 11 20 88						

IN CASE OF AN EMERGENCY ON SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

MEMO

DATE: January 9, 1989

TO: Thomas Meichtry, President & C.E.O

FROM: Quintin Young, Hazardous Waste Specialist

RE: ACID SPILL OF JANUARY 6, 1989

Quintin C. Young

- 1:30 p.m. - Spill occurred.
- 1:40 p.m. - I contacted Sealy first. I talked with John Harrel and told him about the spill.
- 1:45 p.m. - I then contacted Dana, next door and told him about the spill.
- 1:50 p.m. - I called CC Environmental Health. The receptionist referred me to the Office of Emergency Service, CCC.
- 1:52 p.m. - I called and talked to Helen at the Office of Emergency Service, CCC and reported the spill. I informed her it was below the RQ, but we still wanted to notify them.
- 2:00 p.m. - Took Stamco driver to Hospital (Kaiser Emergency) along with the Project Manager from Rollins.

QGY/tdt

**TABLE 117.3 • REPORTABLE QUANTITIES
OF HAZARDOUS SUBSTANCES—Continued**

NOTE: The first number under the column headed "RO" is the reportable quantity in pounds. The number in parentheses is the metric equivalent in kilograms. For convenience, the table contains a column headed "Category" which lists the code letters "X", "A", "B", "C", and "D" associated with reportable quantities of 1, 10, 100, 1000 and 5000 pounds respectively.

Material	Category	PO in pounds (Kilograms)
Zinc cyanide.....	A	10 (4.54)
Zinc fluoride.....	C	1,000 (454)
Zinc formate.....	C	1,000 (454)
Zinc hydrosulfide.....	C	1,000 (454)
Zinc nitrate.....	C	1,000 (454)
Zinc phenolsulfonate.....	D	5,000 (2,270)
Zinc phosphate.....	B	100 (45.4)
Zinc silicofluoride.....	D	5,000 (2,270)
Zinc sulfate.....	C	1,000 (454)
Zirconium nitrate.....	D	5,000 (2,270)
Zirconium potassium fluoride.....	C	1,000 (454)
Zirconium sulfate.....	D	5,000 (2,270)
Zirconium tetrachloride.....	D	5,000 (2,270)

§ 117.11 General applicability.

(a) In compliance with a permit issued under the Marine Protection, Research and Sanctuaries Act of 1972 (33 U.S.C. 1401 et seq.);

(b) In compliance with approved water treatment plant operations as specified by local or State regulations pertaining to safe drinking water;

(c) Pursuant to the label directions for application of a pesticide product registered under section 3 or section 24 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended (7 U.S.C. 136 et seq.), or pursuant to the terms and conditions of an experimental use permit issued under section 5 of FIFRA, or pursuant to an exemption granted under section 18 of FIFRA:

(d) In compliance with the regulations issued under section 3004 or with permit conditions issued pursuant to section 3005 of the Resource Conservation and Recovery Act (90 Stat. 2795; 42 U.S.C. 8901);

(e) In compliance with instructions of the On-Scene Coordinator pursuant to 40 CFR 1510 (the National Oil and Hazardous Substances Pollution Plan) or 33 CFR 153.10(e) (Pollution by Oil and



901 Nevin Avenue
Richmond, California

Department of Emergency Services
1330 Cutting Blvd.
Telephone: 231-7300

Darcia, Joseph
08-03-63
699 3266

IMPRINT AREA

The Department of Emergency Services renders care to patients requiring immediate medical attention. In some cases, further evaluation or treatment will be necessary. These instructions are to help you obtain any further care which is advised by the physician treating you in the Emergency Department. Unless a specific appointment is noted below, it is your responsibility to make arrangements for any additional care. If the condition for which you were treated worsens or if unexpected problems develop, please contact this department or your regular doctor immediately.

1. ☐ No further appointment advised at this time. Please read note above.
2. ☐ An appointment has been scheduled for you in the _____ Clinic with _____ on _____.

3. Please call for an appointment in the following clinic as soon as possible.

- ☐ Orthopedic Clinic 231-4612
☐ Pediatric Clinic 231-4611
☐ Allergy Clinic 231-4612
☐ Ob/Gyn Clinic 231-4618
☐ Ear, Nose & Throat 231-4619
☐ Dermatology Clinic 231-4619
☐ Eye Clinic 231-4622

- ☐ Medical Clinic
B 231-4614
C 231-4620
D 231-4616
☐ Surgical Clinic 231-4614
☐ Psychiatry Clinic 231-7291

You should be seen in about _____ days.

4. If any follow-up is necessary for this problem, please call the following number in the morning for a same day appointment.

- ☐ Orthopedic Clinic 231-4612
☐ Pediatric Clinic 231-4620
☐ Allergy Clinic 231-4612
☐ Ob/Gyn Clinic 231-4670
☐ Ear, Nose & Throat 231-4619

- ☐ Dermatology Clinic 231-4619
☐ Eye Clinic 231-4622
☒ Medical Clinic 231-4650
☐ Surgical Clinic 231-4650
☐ Psychiatry Clinic 231-7291

5. ☐ Please contact your regular physician, Dr. _____, as soon as possible for instructions.
6. ☐ Please return to the Emergency Department in _____ days. Bring this slip with you.
(To see Dr. _____ on _____.)
7. ☐ Instructions regarding _____ are printed on the back of this form for your information. Please read them to refresh your memory concerning your treatment and instructions given to you.
8. ☐ _____

I, the undersigned, acknowledge receipt of a copy of these instructions together with any of the special instructions noted.

PATIENT OR GUARDIAN

ADDRESS

DATE

DAY TIME PHONE NO.

PREPARED BY

WITNESS

MEMO

TO: Keith Gehring
Rollins Environmental Services

CC: J. McCarmon
DOHS - TSCU
Enforcement Unit

FROM: David Burton
Bay Area Environmental, Inc.



DATE: January 11, 1989

RE: Conversation of 1/9/89

As per our conversation of Monday, January 9, 1989, BAE can no longer accept the drums used to package the nitric acid waste from DRMO at the Alameda Naval Air Station. These drums suffer from shortcomings such as:

1. No shock ring on top or bottom.
2. A history of failure at other facilities.
3. They are brittle in cold weather.
4. Possible incompatibility with the acid itself.

We can accept the nitric acid if it's packaged in DOT drums such as:

Poly Line Steel Drums
Act 2 Poly Drums
85 gal. Poly Over Packs

The remaining 14 drums at BAE will require repackaging before shipment from BAE.

db/br

MEMO

DATE: January 9, 1989

TO: Thomas Meichtry, President & C.E.O

FROM: Quintin Young, Hazardous Waste Specialist

Quintin G. Young

RE: ACID SPILL OF JANUARY 6, 1989

- 1:30 p.m. - Spill occurred.
- 1:40 p.m. - I contacted Sealy first. I talked with John Harrel and told him about the spill.
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- 1:50 p.m. - I called CC Environmental Health. The receptionist referred me to the Office of Emergency Service, CCC.
- 1:52 p.m. - I called and talked to Helen at the Office of Emergency Service, CCC and reported the spill. I informed her it was below the RQ, but we still wanted to notify them.
- 2:00 p.m. - Took Stamco driver to Hospital (Kaiser Emergency) along with the Project Manager from Rollins.

QGY/tdt

MEMO



SJE
F.

DATE: December 18, 1988

TO: All Staff

FROM: Thomas M. Meichtry, President and Chief Executive Officer

RE: NOTIFICATION WITHIN FIVE DAYS AFTER A RELEASE

California Health and Safety Code clearly requires that a written submission shall be provided within 5 days of a spill or release. An oral report shall be provided within 24 hours.

The policy at Bay Area Environmental, Inc. is to comply with this requirement.

If all of the necessary information is not available within 5 days the following procedure shall be followed:

1. Call the Department of Health Services within 24 hours of a spill or release.
2. Prepare a brief written notice, review with CEO, and submit this to the Department within 5 days.
3. If more information is needed to complete the report, then send in a supplemental report within 15 days with the additional information.

I have enclosed the various reporting requirements at the State, EPA, our permit and our Operation Plan of April 11, 1983.

As you can see there are different interpretation depending upon which document is used.

We will follow the California Health and Safety Code.

Thank You for your cooperation in this matter. Please let me know if there are any questions.

TMM/tdt
attachments

S+E
F.



BAY AREA ENVIRONMENTAL, INC.
SANTA MARIA STREET RICHMOND, CALIF.

September 13, 1988

Ms. Charlene Williams
Senior Hazardous Materials Specialist
Department of Health Services
North Coast California Section
Toxic Substance Control Division



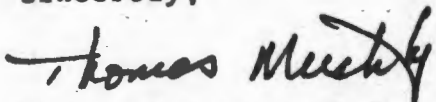
RE: Incident Report September 9, 1988

Dear Ms. Williams:

Attached is the written Incident Report to follow up on my verbal report of September 9, 1988.

Please contact me if there are any questions.

Sincerely,


Thomas Meichtry, P.E.
Chief Executive Officer

TMM/an

enclosures



BAY AREA ENVIRONMENTAL INC.
WASTE MANAGEMENT SERVICES

MEMORANDUM

FROM: David Burton, Operations Manager
Thomas Meichtry, Chief Executive Officer
Kevin Hartnett, Vice President & General Manager

TO: File

DATE: September 13, 1988

SUBJECT: ACETIC ANHYDRIDE INCIDENT REPORT
FRIDAY SEPTEMBER 9, 1988

Between 12:10 to 12:15 p.m. on September 9, 1988, steam vapor was released from a drum stored in the acid bay. All of the release was contained within the storage area and the amount released was less than the reportable quantity (RQ) as listed in the Federal Register.

No injuries or lost time exposures were incurred by any employees.

Cleanup of the release included containment of the steam spray, rinsing the drums and pallets in the storage area and sprinkling the floor area with sodium carbonate to neutralize the low pH liquid that was sprayed with the release of steam. Cleanup was completed by 6:00 p.m. the same day.

During the cleanup process in order to decontaminate the original overpack we transferred the remainder of the Acetic Anhydride to a second drum. This drum also hydrolyzed and released a small amount of steam in the storage bay. However this was controlled and planned as part of the cleanup process.

The mixture in both drums was neutralized to raise the pH to 6 by addition of sodium hydroxide.

Attached is the Uniform Hazardous Waste Manifest #87992083 for the incoming waste. The neutralized waste and cleanup material is still in storage in the facility. This material will be shipped at sometime in the future.

Notifications

The following notifications were made:

1:15 p.m. Ken Axe - Contra Costa County Office of Emergency Services
3:55 p.m. Charlene Williams - Department of Health Service, California
3:58 p.m. Duty Officer - Air Quality Management District

continued

Page 2
September 13, 1988
Memo

The reason for the transfer of the hazardous waste from one container to another was because the waste was being stored in damaged drums inside 85-gallon overpack drums, which is the condition that they were delivered to our facility on March 2, 1988.

These damaged metal drums were considered, in our judgement, to be potential leakers because the corrosive liquid was in damaged steel drums. Although these drums were in an overpack we did not feel comfortable shipping this way.

In order to minimize any potential uncontrolled release, it was our decision to transfer the corrosive waste material from the overpack containers into DOT legal ACT poly drums for transport and disposal.

Upon investigation it was found that the material being transferred was Acetic Anhydride, which had hydrolyzed with water after the material had been transferred.

We had pre-treated the material and found a pH 3 and along with the odor we believed the material to be Acetic Acid or spent Acetic Anhydride but did not expect the material to be water reactive. The manifest indicated it was not water reactive. We would not have accepted it in the first place in March had we known it was water reactive.

The manifest description called the material a Waste Corrosive Liquid N.O.S., Acid Solution, Unknown pH 4, with an attached HAZCAT sheet. The HAZCAT DOT Label indicated Acitic (misspelled) Anhydride, we could not verify the label because the drum it was in was damaged and in an overpack drum. The HAZCAT attached to the manifest showed "Water Reactivity - None".

Based on this information we believed we had a dilute Acetic Acid solution. In order to minimize any potential reaction from the residual contents of the poly drums we were adding the acid into, and in order to buffer and dilute the mixture to lessen the hazard for shipment, we put approximately 15 gallons of water in the poly drum before adding what we believed to be acetic acid.

Had we known the material was water reactive we could have transferred the material into open top drums instead of closed top drums. Any heat release would have dissipated without incident. This was verified during the cleanup process.

As we conducted the cleanup we transferred the material from the closed top poly drum into an open top poly drum and added 50% strength sodium hydroxide and stirred continuously. The pH was raised to 6 without incident.

continued

Page 3
September 13, 1988
Memo

We completed hydrolysis of the remaining waste material as part of the cleanup process.

Following the cleanup procedure a debriefing meeting was conducted from 6:00 until 10:00 p.m. with all operations employees involved in the events of the day. This meeting was the basis of determining what had happened and determining the effectiveness of our response to the incident.

Throughout the weekend and through September 13, discussions continued, to make sure that we fully understood the causes of this incident.

On Monday morning, September 12, at 8:30 a.m. we held another debriefing meeting with all non operational staff to advise them of the incident and the corrective action we had implemented.

On Tuesday evening, September 13, we held our final meeting with key operating managers to reconstruct the incident in full and file this report.

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87337701	5/02/88	UNOCAL CORP. 2175 N. California Blvd. #650 Walnut Creek, CA 94596	Hazardous Solid	2 x 55 gal.	Carbon (Charcol) Petroleum Compounds
87337697	5/02/88	UNOCAL CORP. 2175 N. California Blvd. #650 Walnut Creek, CA 94596	Hazardous Solid	1 x 55 gal.	Carbon (Charcol) Petroleum Compounds
87013060	5/31/88	BALL METAL CONTAINER DIV. 2400 Huntington Drive Fairfield, CA 94533	Combustible Liquid	14 x 55 gal 2 x 55 gal	Water based organic varnish
87013064	5/31/88	BALL METAL CONTAINER DIV. 2400 Huntington Drive Fairfield, CA 94533	Waste Treatment Grease	1 x 55 gal.	Grease from waste water/oil separation process.
87013065	5/31/88	BALL METAL CONTAINER DIV. 2400 Huntington Drive Fairfield, CA 94533	Printing plate waste water	11 x 55 gal.	Water used for rinsing photographic plater.
87013062	5/31/88	BALL METAL CONTAINER DIV. (Same as above)	Combustible Liquid	4 x 55 gal.	Waterpaint sludge
87013063	5/31/88	BALL METAL CONTAINER DIV. (Same as above)	Hazardous Waste Liquid	3 x 55 gal.	Plastic bags of ink residue from solvent distill- ation.
87041954	5/24/88	UNIVERSITY STUDENT COOP 2424 Ridge Road Berkeley, CA 94709	Flammable poisonous liquid waste	1 x 55 gal.	Pesticides.
87092773	5/27/88	CALIFORNIA SCHOOLS c/o Dept. of Health Serv. P.O. Box 942732 Sacramento, CA 94234	RQ Poisonous solid	2 x 55 gal.	Chemicals are reagent grade from various schools partici- pating in S.D.E. Toxic Sweep Program.
			RQ Corrosive solid	1 x 55 gal.	
			RQ Alkaline liquid	1 x 55 gal.	
			RQ Flammable Corrosive Liquid	1 x 55 gal.	

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87092751	5/27/88	CALIFORNIA SCHOOLS c/o Dept. of Health Serv. P.O. Box 942732 Sacramento, CA 94234	RQ Waste Oxydizer RQ Poisonous Solid	1 x 55 gal. 1 x 55 gal.	Lab pack waste from schools participating in Toxic Sweep Program.
87487668	5/10/88	LOCKHEED MISSILES & SPACE CO., INC. 1111 Lockheed Way B/131 O/47-30 Sunnyvale, CA 94088-3501	Beryllium Compound N.Q.S. Alkaline (Corrosive) Liquid	3 x 55 gal. 1 x 55 gal.	Beryllium Compound N.Q.S. Alkaline (Corrosive) Liquid
87092772	5/27/88	CALIFORNIA SCHOOLS c/o Dept. of Health Serv. P.O. Box 942732 Sacramento, CA 94234	RQ Poisonous Solid RQ Corrosive Solid RQ Alkaline Corrosive Liquid RQ Oxidizer	13 x 55 gal. 4 x 55 gal. 3 x 55 gal. 8 x 55 gal.	All are reagent grade from school participating in Toxic Sweep Program.
87090623	5/11/88	CALIFORNIA SCHOOLS (Same as above)	RQ Poisonous Liquid RQ Poison Solid RQ Corrosive Solid	4 x 55 gal. 6 x 55 gal. 2 x 55 gal.	From various schools partici- pating in Toxic Sweep Program
87487653	5/02/88	LOCKHEED MISSILES & SPACE CO., INC. 1111 Lockheed Way B/131 O/47-30 Sunnyvale, CA 94088-3501	Oxidizer Corrosive Liquid	1 x 55 gal.	
87487654	5/02/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 O/47-30 (Same as above)	Flammable Liquid Hazardous Liquid Hazardous Solid	1 x 55 gal. 2 x 55 gal. 1 x 55 gal.	Oily waste Water/paint Sludge Deburring Compound in Solidsorb
			Flammable Liquid	1 x 55 gal.	Lab Pack

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87487658	5/03/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	Flammable Liquid Hazardous Solid	2 x 55 gal. 2 x 55 gal.	Flammable Lab Packs Oil contaminated Rags
87487657	5/03/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	Hazardous Liquid	2 x 55 gal.	Contains refridgeration oil, freon, water.
87487674	5/19/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	RQ Combustible Liquid	1 x 55 gal.	
87487673	5/19/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	RQ Electric storage wet filled with acid. RQ Solid Corrosive	1 x 55 gal. 1 x 55 gal.	Lab pack
87487670	5/19/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	Hazardous Solid Flammable Liquid	1 x 55 gal. 2 x 55 gal.	Oily rags. Flammable liquid lab pack
87487675	5/19/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	RQ Flammable	2 x 55 gal.	
87487661	5/10/88	LOCKHEED MISSILES & SPACE CO., INC. B/131 0/47-30	Hazardous Liquid Waste flammable liquid Hazardous solid RQ Hazardous solid	1 x 55 gal. 2 x 55 gal. 1 x 55 gal. 1 x 55 gal.	Water, freon & other chlorin. solvents. PCB's rejected drum
87430578	5/05/88	PACIFIC GAS & ELECTRIC 3004 Geneva Ave. Daly City, CA 94014	Sodium hydroxide liquid Ammonium hydroxide Hydrochloric acid	1 x 55 gal. 1 x 55 gal. 1 x 55 gal.	

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87601536	5/20/88	PACIFIC GAS & ELECTRIC 77 Beale St., Room 105 San Francisco, CA 94106	Hazardous solid, lab pack Flammable liquid	7 x 55 gal. 1 x 55 gal.	Empty Petroleum solvent mixture
87601594	5/25/88	PACIFIC GAS & ELECTRIC 1030 Detroit Ave. Concord, CA 94518	Empty with hazardous solid residue	21 x 55 gal.	Insulating oil
87092747	5/11/88	PACIFIC BELL 2600 Camino Ramon Room 2E050 San Ramon, CA 94583	Electric batteries, alkali; wet Electric batteries, acid, wet Hazardous Solid Flammable Liq.	1 x 55 gal. 1 x 55 gal. 7 x 55 gal. 2 x 55 gal.	2 - crushed empty 5 - empty Rejected 1 drum, PCB material
87092752	5/11/88	PACIFIC BELL (Same as above)	Corrosive Solid	1 x 55 gal.	Battery contaminated with battery fluid packed in absorbant.
87056146	5/19/88	NATIONAL SEMICONDUCTOR CORP. 313 Fairchild Drive Mountain View, CA 94039	Corrosive Solid	1 x 55 gal.	
87088434	5/12/88	NATIONAL SEMICONDUCTOR CORP. (Same as above)	Cyanide dry mixture Alkaline liquid Corrosive solid	1 x 55 gal. 1 x 55 gal. 9 x 55 gal.	
87515816	5/13/88	NAVAL FACILITY Centerville Beach Ferndale, CA 95536	Waste battery Battery fluid Battery fluid Hazardous Liquid	1 x 55 gal. 3 x 55 gal. 34 x 55 gal. 1 x 55 gal.	2 - Lead-acid storage batteries Empty Anti-freeze, mineral spirits mixture
87515817	5/13/88	NAVAL FACILITY (Same as above)	Poison Waste solid	1 x 55 gal.	Anticoagulant rodenticide

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87088409	5/02/88	CO. OF SANTA CLARA P.O. Box 4009 Milpitas, CA	Flammable Solid	6 x 55 gal.	Rags, dirt with flammable liquid.
			Flammable Liquid	2 x 55 gal.	Flammable liquids overpacked.
87088427	5/19/88	SANTA CRUZ CO. DOHS 701 Ocean St. Santa Cruz, CA 95060	Flammable Corrosive	1 x 55 gal.	Solidified.
87441999	5/14/88	CLAYTON ENVIRONMENTAL CONSULTANTS 1250 Quarry Lane Pleasanton, CA 94566	Hazardous Liquid	1 x 55 gal.	89 ppb methylene Chloride
			Corrosive Liquid	1 x 55 gal.	Neutralized metal extracts
			Flammable Liquid	2 x 55 gal.	Vials
87088426	5/12/88	AMERICAN ENVIRONMENTAL 11855 White Rock Road Rancho Cordova, CA 95670	Hazardous Solid Waste Oxidizer	1 x 55 gal.	Soil samples Trace metals From Lockheed
87017823	5/17/88	CITY OF VALLEJO Police Department 111 Amador Vallejo, CA 94590	Flammable Liquid	1 x 55 gal.	Lab Pack
87041842	5/26/88	ION SYSTEMS INC. 2541 - 10th St. Berkeley, CA 94710	Methyl ethyl ketone	1 x 5 gm.	
87650611	5/05/88	XOMA CORP. 2910 - 7th St. Berkeley, CA 94710	Flammable Liquid	5 x 1 gal.	Solvent Waste
87041948	5/18/88	DOCTORS HOSPITAL OF PINOLE 2151 Appian Way Pinole, CA 94564	Mercury	1 x 5 lbs.	Mercury contaminated debris.
87092768	5/25/88	D.O.H.S. CITY OF BERKELEY 2180 Milvia St. Berkeley, CA 94704	Hazardous Solid	7 x 55 gal.	Empty drums last contained paint sludge & oil sludge.

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87643724	5/05/88	NAVAL AIR STATION ALAMEDA Naval Aviation Depot Code 73400 Alameda, CA 97501	Corrosive Liquid	1 x 55 gal.	Ferric chloride solution
87992208	5/05/88	IT TRANSPORTATION 4501 Pacheco Blvd. Martinez, CA 94553	Hazardous Solids	13 x 55 gal.	Drilling muds & solidisorb
87041940	5/11/88	DEVICES VASCULAR INTERVENTION 595 Penobscot Drive Redwood City, CA 94063	Flammable Liquid	1 x 55 gal.	MEK, FREON
			Flammable Liquid	1 x 55 gal.	Dichloromethane
			Poisonous Liquid	1 x 55 gal.	Tetra-Etch etchant
87088393	5/02/88	CALTRANS-DISTRICT 4 500 Queens Lane San Jose, CA 95112	Flammable Corrosive Liquid	1 x 55 gal.	
			Oxidizer Corrosive Liquid	1 x 55 gal.	
			Flammable Liquid	1 x 55 gal.	
87041945	5/19/88	G.T. ENVIRONMENTAL 4080 Pike Lane Concord, CA 94520	Hazardous Solid	3 x 55 gal.	Petroleum tainted Soils
			Corrosive Liquid	1 x 55 gal.	Nitric hydrochloric Acids
			Flammable Liquid	1 x 55 gal.	Methanol & Freon
87041942	5/13/88	C.F.S. CORPORATION 5110 - 7th Oakland, CA	Combustible Liquid	1 x 55 gal.	Hydraulic oil
87090888	5/19/88	TRAVIS A.F.B. Travis, CA 94535	Compressed Gas	1 x 55 gal.	Aerosol spray Cleaner
87092770	5/27/88	SACRAMENTO CO. Crime Lab/Coroner's Office 4400 "V" St. Sacramento, CA 95817	Poison B Liquid	3 x 55 gal.	Excess out of date, unspent laboratory chemical.
			Poison B Liquid	1 x 55 gal.	
			Corrosive Solid	2 x 55 gal.	
			Corrosive Liquid	1 x 55 gal.	

LAW AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87088429	5/25/88	FOOTHILL DE ANZA COMMUNITY COLLEGE DIST. 12345 El Monte Road Los Altos Hills, CA 94022	Hydrofluoric Acid	1 x 55 gal.	Ammonium Fluoride- Water
87090887	5/19/88	SYSTRON DONNER 2727 Systron Drive Concord, CA 94518	Corrosive Oxidizer Poison B Liquid Poison B Solid Alkaline Corrosive Liquid	7 x 55 gal. 2 x 55 gal. 2 x 55 gal. 2 x 55 gal.	
87017801	5/17/88	EXPLOSIVE TECHNOLOGY 2 Miles East on Hwy. 12 Fairfield, CA 94583	Waste Oil Waste Paint related material Butyl Cello- solve solid Flammable liquid	2 x 55 gal. 2 x 55 gal. 10 x 5 gal. 2 x 55 gal.	Lube & Motor Oil 10 - 5 gal. pails Butoxyethanol & Water
87643782	5/07/88	DEFENSE REUTILIZATION & MARKETING OFFICE 2155 Mariner Square Building #6 Alameda, CA 94501-1022	Compressed Gas	1 x 55 gal.	Aerosols
87041952	5/24/88	SUN FLEX, INC. 73 Digital Drive Novato, CA 94947	Hazardous Liquid	2 x 55 gal.	Carbon black Solution
87041951	5/23/88	MT. DIABLO HOSPITAL 2540 East St. Concord, CA 94520	Formaldehyde Solution	4 x 55 gal.	Biological remains from histological lab.
87354285	5/19/88	TOSCO CORP. Avon Refinery Martinez, CA 94553	Hazardous	195 x 55 gal.	Empty drums
87041943	5/19/88	SOLANO CO. PUBLIC HEALTH 355 Tuolumne St. Vallejo, CA 94590	Hazardous Solid	1 x 55 gal.	Mercuric chloride/ Feces/laboratory chemicals

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

RECEIPT NO.	DATE	NAME & ADDRESS	TYPE OF WASTE	VOLUME	NOTES
87041938	5/11/88	MARIN GENERAL HOSPITAL 250 Bon Air Road Greenbrae, CA 94901	Waste Oil	1 x 55 gal.	Hydraulic Oil
87041934	5/02/88	INTERGENE CORP. 433 Industrial Way Benicia, CA 94510	Flammable Liquid	4 x 55 gal.	Butanol
			Poison B Liquid	1 x 55 gal.	Phenol, Chloroform, Hecton, Nitrile.
87487660	5/05/88	LOCKHEED MISSILES & SPACE CO., INC. 1111 Lockheed Way B/131 O/47-30 Sunnyvale, CA 94088-3501	Hazardous Liquid	1 x 55 gal.	Contains refrigeration, oil, freon, water.
Non-Hazardous Waste	5/31/88	CHEVRON-LONE STAR 333 - 23rd Ave. Oakland, CA 94606	Drilling Mud	35 x 55 gal.	Trace Diesel Contamination



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

September 13, 1988

Ms. Charlene Williams
Senior Hazardous Materials Specialist
Department of Health Services
North Coast California Section
Toxic Substance Control Division

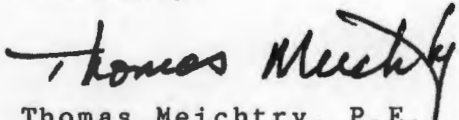
RE: Incident Report September 9, 1988

Dear Ms. Williams:

Attached is the written Incident Report to follow up on my verbal report of September 9, 1988.

Please contact me if there are any questions.

Sincerely,


Thomas Meichtry, P.E.
Chief Executive Officer

TMM/an

enclosures

ICF	TECHNOLOGY
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER <input checked="" type="checkbox"/> _____	DATE _____



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

MEMORANDUM

FROM: David Burton, Operations Manager
Thomas Meichtry, Chief Executive Officer
Kevin Hartnett, Vice President & General Manager

TO: File

DATE: September 13, 1988

SUBJECT: ACETIC ANHYDRIDE INCIDENT REPORT
FRIDAY SEPTEMBER 9, 1988

Between 12:10 to 12:15 p.m. on September 9, 1988, steam vapor was released from a drum stored in the acid bay. All of the release was contained within the storage area and the amount released was less than the reportable quantity (RQ) as listed in the Federal Register.

No injuries or lost time exposures were incurred by any employees.

Cleanup of the release included containment of the steam spray, rinsing the drums and pallets in the storage area and sprinkling the floor area with sodium carbonate to neutralize the low pH liquid that was sprayed with the release of steam. Cleanup was completed by 6:00 p.m. the same day.

During the cleanup process in order to decontaminate the original overpack we transferred the remainder of the Acetic Anhydride to a second drum. This drum also hydrolyzed and released a small amount of steam in the storage bay. However this was controlled and planned as part of the cleanup process.

The mixture in both drums was neutralized to raise the pH to 6 by addition of sodium hydroxide.

Attached is the Uniform Hazardous Waste Manifest #87992083 for the incoming waste. The neutralized waste and cleanup material is still in storage in the facility. This material will be shipped at sometime in the future.

Notifications

The following notifications were made:

1:15 p.m. Ken Axe - Contra Costa County Office of Emergency Services
3:55 p.m. Charlene Williams - Department of Health Service, California
3:58 p.m. Duty Officer - Air Quality Management District

continued

Page 2
September 13, 1988
Memo

The reason for the transfer of the hazardous waste from one container to another was because the waste was being stored in damaged drums inside 85-gallon overpack drums, which is the condition that they were delivered to our facility on March 2, 1988.

These damaged metal drums were considered, in our judgement, to be potential leakers because the corrosive liquid was in damaged steel drums. Although these drums were in an overpack we did not feel comfortable shipping this way.

In order to minimize any potential uncontrolled release, it was our decision to transfer the corrosive waste material from the overpack containers into DOT legal ACT poly drums for transport and disposal.

Upon investigation it was found that the material being transferred was Acetic Anhydride, which had hydrolyzed with water after the material had been transferred.

We had pre-treated the material and found a pH 3 and along with the odor we believed the material to be Acetic Acid or spent Acetic Anhydride but did not expect the material to be water reactive. The manifest indicated it was not water reactive. We would not have accepted it in the first place in March had we known it was water reactive.

The manifest description called the material a Waste Corrosive Liquid N.O.S., Acid Solution, Unknown pH 4, with an attached HAZCAT sheet. The HAZCAT DOT Label indicated Acitic (misspelled) Anhydride, we could not verify the label because the drum it was in was damaged and in an overpack drum. The HAZCAT attached to the manifest showed "Water Reactivity - None".

Based on this information we believed we had a dilute Acetic Acid solution. In order to minimize any potential reaction from the residual contents of the poly drums we were adding the acid into, and in order to buffer and dilute the mixture to lessen the hazard for shipment, we put approximately 15 gallons of water in the poly drum before adding what we believed to be acetic acid.

Had we known the material was water reactive we could have transferred the material into open top drums instead of closed top drums. Any heat release would have dissipated without incident. This was verified during the cleanup process.

As we conducted the cleanup we transferred the material from the closed top poly drum into an open top poly drum and added 50% strength sodium hydroxide and stirred continuously. The pH was raised to 6 without incident.

continued

Page 3
September 13, 1988
Memo

We completed hydrolysis of the remaining waste material as part of the cleanup process.

Following the cleanup procedure a debriefing meeting was conducted from 6:00 until 10:00 p.m. with all operations employees involved in the events of the day. This meeting was the basis of determining what had happened and determining the effectiveness of our response to the incident.

Throughout the weekend and through September 13, discussions continued, to make sure that we fully understood the causes of this incident.

On Monday morning, September 12, at 8:30 a.m. we held another debriefing meeting with all non operational staff to advise them of the incident and the corrective action we had implemented.

On Tuesday evening, September 13, we held our final meeting with key operating managers to reconstruct the incident in full and file this report.

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.2. Page 1
of 1Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

TULUMNE COUNTY SHERIFF
25 NORTH LOWER SUNSET DR. (209)

4. Generator's Phone

Solana, CA 95370 533-5215

5. Transporter 1 Company Name

6. US EPA ID Number

I.T. Corp. MTZ. SERV (CA) 00000181211

7. Transporter 2 Company Name

8. US EPA ID Number

IT Corp. MTZ. SERVICES (CA) 00000181211

9. Designated Facility Name and Site Address

10. US EPA ID Number

DAY AREA ENVIRO.
1125 HENSLEY ST.

RICHMOND, CA 94804 (CA) 0000014079

A. State Manifest Document Number

87992083

B. State Generator's ID

BONE ALEXANDER

C. State Transporter's ID

20547

D. Transporter's Phone

(415) 372-7100

E. State Transporter's ID

801597

F. Transporter's Phone

(415) 233-8001

G. State Facility's ID

H. Facility's Phone

I. Waste No.

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/VolWASTE CORROSIVE LIQUID, NOS.
UN1760

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol

b.

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol

c.

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol

d.

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol

J. Additional Descriptions for Materials Listed Above

112 = acid solution - UNKNOWN - P.H. - 4
SEE ATTACHED HAZ. CAT. SHEET.
2X 55 gal. drums PACKED IN 85 gal. Recovery
drum for TRANSPORTING

K. Handling Codes for Wastes Listed Above

a.

b.

c.

d.

15. Special Handling Instructions and Additional Information

AVOID SKIN CONTACT, WEAR PRO-CLTHING WHEN HANDLING

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

John Hill

John Hill

02/27/88

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

S. P. Hill

S. P. Hill

02/27/88

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

John B. Gons

John B. Gons

02/27/88

19. Discrepancy Indication Space

Printed/Typed Name

Signature

Month Day Year

John B. Gons

John B. Gons

02/27/88

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

John B. Gons

John B. Gons

02/27/88

1 (1/87)

WHITE: TSDF RETAINS

INSTRUCTIONS ON THE BACK

previous editions are obsolete.

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY

SAMPLE NO. _____
ANALYST'S INITIALS _____
DATE _____

SR - LIQ
WASTE SITE REMEDIATION
HAZARD CATEGORIZATION PROCEDURE
LIQUIDS

1. OBSERVE

- a. Container shape/type/specification #
- b. Labels
- c. Spill dimensions (LxWxD)
- d. Color, viscosity, specific gravity, turbidity, crystallization
- e. Vapors, reactions, odors
- f. Local effects (damage, harm)
- g. Terrain, drainage, wind, weather

RESULT

DOT LABEL

55 gal. drum
Corrosive
None
Clear
Corrosive

acetic anhydride

2. OBTAIN SAMPLE

- a. Approach from upwind. Read combustible gas indicator and pH paper.
- b. Obtain small representative sample.

3. TESTS

- a. Flammability of headspace vapors (Could be combustible even if not flammable.)

Neg
>1000 ppm (EX-3A) or
>0% LEL (EX-3)

Flammable
Liquid
Flammable
Liquid

- b. Combustibility - (Only if negative results for flammability above) (Place small quantity of unknown liquid on a spatula or scoopula. If it ignites readily and maintains combustion, unknown is combustible. Note any viscosity change which might indicate polymerization. A safer variant of this test is to absorb the unknown liquid in an inert absorbent and then test the vapors.)

Neg
Positive if combustion
is sustained

Combustible
(no label)

- c. Specific gravity, compared to water. (Add water to sample and determine sp. gr.)

Sinks

Floats

- 1. If liquid sinks, screen for chlorinated compound - Beilstein Test - Heat copper wire in flame until flame is no longer colored. Cool wire; dip wire loop into the original compound and heat in the edge of flame. A green flame indicates halogen. (NOTE: very volatile liquids may evaporate prior to decomposition, thus causing failure of test).

Flame Color

TEST RESULT

- 2. If liquid floats and appears to be oil, screen for PCB's >7ppm.

- d. Water Reactivity - (Note any color change.)

None
heat, bubbles, vapors

Flammable
solid and
dangerous
when wet

- e. Water Solubility - (Use about one part unknown to five parts water. May need to heat gently. DO NOT HEAT IF WATER REACTIVE.)

Partial
Total or partial

SAMPLE NO. 142
ANALYST'S INITIALS S
DATE 2-1-88

f. pH of aqueous solution

1. pH > 9 ... Yes - screen for cyanide and sulfide.
2. pH < 2 ... Yes - screen for halide and nitrate.
3. pH 3-9 ... Yes - screen for oxidant and chlorinated hydrocarbon.

g. Oxidant - (If water soluble, wet KI - starch paper with conc. HCl using a clean pipet. Touch unknown solution to paper. Touching KI paper with hand will give a false positive. If oxidizer, STOP HERE.)

h. Cyanide - (Dissolve unknown in H₂O. Add NaOH solution until pH is 11. Add 3-4 drops p-dimethylaminobenzal rhodanine. Add 1 drop 0.02 N silver nitrate. Can confirm measure with Drager tube and acid.)

i. Sulfide - (Wet Lead Acetate paper with H₂O. Adjust pH to 4 with HCl. Hold paper above solution.)

j. Chlorinated hydrocarbon - Beilstein Test - Heat copper wire in flame until flame is no longer colored. Cool wire; dip wire loop into the original compound and heat in edge of flame. A green flame indicates halogen.

RESULT

5
5, 9

DOT LABEL

Corrosive

is positive if no color change

Poison

Brown discoloration is positive

Poison

Flame color

4. LABORATORY CONFIRMATION OF POSITIVE HAZ CAT SCREEN TESTS
Laboratory confirmation is required for positive haz cat screen tests.

Test

Haz Cat Positive

- a. Cyanide
- b. Sulfide
- c. Strong oxidant
- d. Chlorinated hydrocarbons - PCB's, chlorinated solvents, chlorinated pesticides.

5. JOB NUMBER: 140899 SAMPLE NUMBER 142 DATE OF TEST 2-27-88
HAZ CAT TECHNICIAN EARL G. Hill SIGNATURE

FIELD CHEMIST SIGNATURE

6. CHAIN OF SAMPLE CUSTODY:

Given to

Date/Time

Received By

INCIDENT REPORT



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

June 23, 1988

ICF	TECHNOLOGY
	DOCUMENT SOURCE
DOHS	RWQCB
DATE	

At 8:00 a.m. during his routine daily inspection, Mr. Lee Wheeler, Operations Supervisor, observed a ~~corroded~~ leak drum stored in the Acid bay. The leak was estimated at approximately 2 to 10 gallons. The liquid covered approximately 80 to 100 square feet in the containment bay and was immediately responded to by application of absorbent material and lime. Cleanup was completed by 9:00 a.m.

There was no human exposure or threat to the environment at any time during the incident.

Further cleanup will consist of stain removal from the concrete containment pad and resealing of the floor with an epoxy sealant.

The leaking drum had apparently developed a hole during the night of the 22nd of June because the daily inspection of June 22nd did not show any leakage.

A forensic investigation was initiated at 10:00 to determine the cause of the leakage.

The results of the investigation are as follows:

FINDINGS

1. A physical inspection of the drum revealed a small hole 1/4 inch diameter approximately 6 inches from the base.
2. The drum was originated by I.T. Corporation from the Generator Fairchild Semiconductor, San Rafael.
See Attached Manifest No.870449051.
3. The drum was transported to the BAE facility on June 15, 1988, by I.T. Corporation, Martinez.

SUSPECTED CONTRIBUTING CAUSES

1. It appears that due to the mixture of several acids in the drum when it was originally packed by I.T. Corporation, the acid mixture eroded the side wall of the drum and the reaction pressure within the drum caused a spray of acid to exit the drum horizontally.
2. There is reason to believe that there may be a manufacturing defect.

(continued)

INCIDENT REPORT
PAGE TWO

3. There was no free-standing liquid in the drum when it was unpacked for inspection.

Other evidence:

Another drum from the same manufacturer was found to have a defect in the same location, same size hole. That was discovered during the original packing work on or about June 4, 1988. This drum was not used because the defect was discovered at that time. According to Mike Garant, I. T. Corporation, Project Supervisor, this drum was marked by I.T. at the defect and the drum was taken out of service. This drum is currently being held at I. T., Martinez.

I. T. is notifying the drum reconditioning company. The company is Cooper Drum in Southern California.

The following notifications were made following the incident:

1. Barbara Cook, P.E.
Senior Waste Management Engineer
DHS - State of California
Emeryville, CA 94608
(415) 540-2043
Verbal report given by Thomas Meichtry at 4 p.m., June 23, 1988.
2. James A. McCammon
Waste Management Specialist II
DHS - State of California
Emeryville, CA 94608
(415) 540-2043
Message left at 3:45 p.m., June 23, 1988. Returned call at 2:00 p.m. on June 24, 1988, and full verbal report given by Thomas Meichtry at that time.
3. I. T. Corporation notified at 8:30, June 23, 1988. Don Bigilow responded. Frank Gorrey, General Manager, notified by Don Bigilow, Frank Gorrey made site inspection with Mike Garant on June 24th from 11:00 a.m. until 2:00 p.m. to aid in forensic investigation and assess damage.
4. Contra Costa County
Office of Emergency Services
County Health Superintendent
Jim Gallagher
(415) 646-1112
At 4:45 p.m. June 23, 1988, he said that we "do not need to report as long as we report to DHS."

(continued)

INCIDENT REPORT
PAGE THREE

5. Fairchild Semiconductor

Generator

Bob Bostick

Tom Jones, Consultant

(408) 437-5324

(415) 479-1401

Messages left by Thomas Meichtry on June 24th in the morning.
Frank Gorrey said he would contact them since they were his clients.

6. Greg Geory

Fairchild National Semiconductor

(408) 721-7267

Thomas Meichtry notified him at 9:00 a.m. on June 24th. He said he was not the correct company but that Fairchild Semiconductor was involved.

7. Ray Manzelli

(415) 962-4696

Fairchild National Semiconductor

Notified at 9:00 a.m., June 24th. Not the correct company.

8. Lou Monsour

Environmental Coordinator

Facility Maintenance Manager

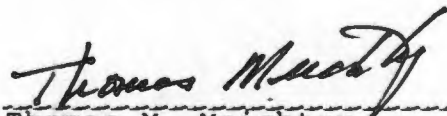
(415) 962-4226

(415) 962-4011

Mountain View

Fairchild

Notified 9:30 a.m., June 24, 1988, by Thomas Meichtry.


Thomas M. Meichtry
Chief Executive Officer
June 24, 1988

W

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

CAD 000144619

Manifest
Document No.

90024

2 Page 1
of 2

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

Fairchild Semiconductor
4300 Redwood Hwy., San Rafael, CA., 94903

4. Generator's Phone (415) 479-1401

A. State Manifest Document Number

87049051

B. State Generator's ID

HA-HQ 36-005960

C. State Transporter's ID

801597

D. Transporter's Phone (415) 372-9100

E. State Transporter's ID

F. Transporter's Phone

5. Transporter 1 Company Name

IT Corporation, Martinez

6. US EPA ID Number

CAD 000083121

8. US EPA ID Number

7. Transporter 2 Company Name

9. Designated Facility Name and Site Address

Bay Area Environmental, Inc.,
1125 Hensley St.,
Richmond, CA., 94804

10. US EPA ID Number

CAT 080014079

G. State Facility's ID

H. Facility's Phone

(415) 233-8001

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

a.	Waste Corrosive Liquid, NOS NA 1719 (LP)	2	D, M	25	G	State 541 EPA/Other D002
b.	Waste Oxidizer, NOS UN 1479 (LP)	1	D, M	7	G	State 541 EPA/Other D003
c.	Waste Poisonous Solid, NOS UN 2811 (S)	2	D, M	60	P	State 541 EPA/Other D003
d.	Waste Corrosive Solid, NOS UN 1759 (S)	1	D, M	150	P	State 551 EPA/Other D002

J. Additional Descriptions for Materials Listed Above

a, b, c, & d;

See attached list for specific components and
chemical compositions.

K. Handling Codes for Wastes Listed Above

a.	b.
c.	d.

15. Special Handling Instructions and Additional Information

AVOID SKIN CONTACT, WEAR PROTECTIVE CLOTHING WHEN HANDLING.

EH # 2-9893

16.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Kenneth I. Kincaid, Agent

Signature

Kenneth I. Kincaid

Month Day Year
06 15 88

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Danny Brown

Signature

Danny Brown

Month Day Year
06 15 88

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

LEE WHEELER For BAE

Signature

Lee Wheeler

Month Day Year
06 15 88

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY

87049051

GENERATOR NAME: FAIRCHILD SEMICONDUCTOR
GENERATOR ADDRESS: 4300 OLD REDWOOD HIGHWAY, SAN RAFAEL, CA. 94903
GENERATOR EPA No.: CAD009144619

MANIFEST NUMBER:

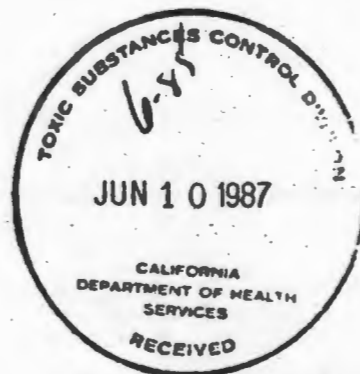
87049051 d.

FC #7	6 EA	1 GAL	SOLID	ETCHANT (FERRIC CHLORIDE) pH 2	SOLIDIFIED
FC #7	4 EA	1 GAL	SOLID	MARKEM 535 CLEANER pH <1	SOLIDIFIED
FC #7	2 EA	1 GAL	SOLID	ALPHA 994 SURFACE CONDITIONER	SOLIDIFIED
FC #7	1 EA	1 GAL	SOLID	HYDROCHLORIC ACID 20% <i>X</i>	SOLIDIFIED
FC #7	2 EA	1 GAL	SOLID	DESCALER 601 pH <1	SOLIDIFIED
FC #7	1 EA	1 GAL	SOLID	KESTER 5520 CLEANER pH <1	SOLIDIFIED
FC #7	2 EA	1 GAL	SOLID	FLUX 1086 pH <1	SOLIDIFIED
FC #7	1 EA	1 LBS	SOLID	GLUCONIC ACID	
FC #7	1 EA	1 LBS	SOLID	STEARIC ACID	
FC #7	1 EA	1 LBS	SOLID	CITRIC ACID	
FC #7	1 EA	1 LBS	SOLID	TARTARIC ACID	



**BAY AREA
ENVIRONMENTAL**

June 9, 1987



Mr. Dan Murphy
Department of Health Services
Toxic Substance Control Division
2151 Berkeley Way
Berkeley, CA 94704

Dear Mr. Murphy:

I have enclosed Bay Area Environmental's monthly report,
which covers the period of May 1, 1987 to May 31, 1987.

Sincerely,

David Burton
Hazardous Materials Specialist

DB/an

Enclosures:

Monthly Report
Summary Sheet
37 Manifests
13 Homeowner receipts

BAY AREA ENVIRONMENTAL
RICHMOND, CALIFORNIA

MONTHLY REPORT

Number of Drums Received at the Station 159

Number of Drums Shipped to Class 1 Site 173

Drums at the Station:

	<u>Size</u>	<u>Quantity</u>
Acid	<u>55 gallon</u>	<u>51</u>
Alkaline Solution	<u>" "</u>	<u>54</u>
Poison B	<u>" "</u>	<u>89</u>
Flammable	<u>" "</u>	<u>72</u>
Oxidizer	<u>" "</u>	<u>51</u>

No. of California Hazardous Waste Manifest Attached: 37

No. of Receiving Forms Attached: 13

DATE 6/5/87

David Burton
Signature

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

Receipt No.	Date	Name & Address	Type of Waste	Volume	Notes
87041526	5/14	Sea-Tel Corporation 837 Arnold Drive Martinez CA 94553	ORM-E	55gal	Butylcellusolve diluted 5:1 with water and hydraulic oil
87041527	5/14	MT Diablo Hospital 2540 East street Concord CA 94520	Flammable ORM-A	55gal 3x55gal	waste Zylene Formaldehyde & human body parts
87005687	5/15	DRMO 2155 mariner square Alameda CA 94501	Corrosive	55gal	Cleaning compounds
87087050	5/68	Port of Stockton 2201 W. Washington Stockton CA 95201	Flammable Combustible Corrosive	2x55gal 55gal 55gal	39% Halogenated liquids
87041521	5/67	Rafael Mendoza 722 6th ave Redwood City	ORM-E	3x55gal	oil contaminated soil
86490650	5/15	Sycamore Homes Ass. 635 Old Orchard Rd Danville CA 94526	ORM-E	3x55gal	90% water, 10% oil; water contaminated with crankcase oil
86113380	5/26	Duidental Development Co 453 La Paz Lane Santa Rosa CA 95404	ORM-E	3x55gal	Solid Sorb and absorbent material soaked with oil.

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

Receipt No.	Date	Name & Address	Type of Waste	Volume	Notes
203	5/18/87	Indian Rock Const 643 Clairmont Ave Berkeley CA 94708	Flammable	9 gal	waste Paint
204	5/21/87	Stephen Wilkerson 161 Idora Ave San Francisco CA 94127	Flammable	2 lb	CaCl ₂
205	5/26	E Jerry Powell 45 B Costa St San Francisco CA 94110	Flammable	2 gal	H ₂ O + gasoline
206	5/26	George Wynns 124 Brewster San Francisco CA	Poison B	1 qt	weed be gone
207	5/28	Phyllis Defabio 853 Kern St Richmond CA	Flammable	8 x 1 gal	waste Paint

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

Receipt No.	Date	Name & Address	Type of Waste	Volume	Notes
193	4/12	Joe Cooper City of Antioch Antioch P.O. Box 130	ORM-E	10 gal	Dry powder & soil
196	5/14	A.P. Construction 54 San Jose Ave San Jose CA	Flammable	3x5 gal	waste paint
197	5/12	Judith Fauer 3058 Bellevue Ave Berkeley CA 94705	Flammable	4x1 gal	Kerosene, Paint Thinner, Paint
198A	5/12	Kathleen Cliggett 37 Via San Fernando Tiburon CA 94920	Flammable	5 gal	Paint
198B	5/12	Contra Costa Co Sheriff 1122 Escobar Martinez CA 94553	Flammable	4x1 lb	phosphorus Pentoxide
199	5/13	Kathleen Cliggett 37 Via San Fernando Tiburon CA 94920	Flammable	5x1 gal	waste paint
200	5/13	Kathleen Cliggett 37 Via San Fernando Tiburon CA 94920	Caustic Flammable	5 gal	Paint related material
201	5/13	TarPan studios 1925 Francisco San Rafael 94705	flammable	2x1 gal	waste paint

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

<u>manifest</u> <u>Receipt</u> <u>No.</u>	<u>Date</u>	<u>Name & Address</u>	<u>Type of Waste</u>	<u>Volume</u>	<u>Notes</u>
86417023	5/21	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	Alkaline Corrosive Flammable ORM-E ORM-E	55gal 55gal 5gal > m/t Containers	See Attached list
86417033	5/21	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	Flammable	55gal	mixed organic solvents
86417022	5/21	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	ORM-E Flammable	55gal 2 x 5gal	See Attached list
86417024	5/21	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA, 94088	Flammable ORM-E ORM-E ORM-E	55gal M/T's M/T's M/T's	See Attached list
86417021	5/21	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	Flammable	55gal	See Attached list
86417005	5/12	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	Corrosive	5 x 15gal	See Attached list.
86417004	5/12	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	Corrosive	15gal	See Attached list.
86417002	5/12	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	ORM-E	M/T Containers	See Attached list.
86417001	5/12	Lockheed Missiles & space 1111 Lockheed way B/142 Sunnyvale CA 94088	ORM-E ORM-E	2 x 55gal M/T Containers	See Attached list
87041524	5/67	Ion Systems 2546 10th street Berkeley CA 94710	Flammable	5gal	Methyl Ethyl Ketone

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

Receipt No.	Date	Name & Address	Type of Waste	Volume	Notes
87041588	5/28	Ion Systems 2541 10 th street Berkeley CA 94710	Flammable	2x5gal	Waste Methyl Ethyl ketone.
87005676	5/15	Oakland Naval supply ctn Point Molate site Richmond CA 94801	ORM-E	4x55gal	Oil sludge
87005610	5/11	DRMO Bldg #6 2155 Mariner Square Loop Alameda CA 94501	Corrosive	6x55gal	Cleaning solution (Sodium Hydroxide)
87087047	5/6	City of Albany 1000 San Pablo ave Albany CA 94706	Corrosive	55gal	Titanium Tetrachloride
87041525	5/05	G.R.T. Book Printing 3960 E. 14 th Street Oakland CA 94601	ORM-E	55gal	solvent stabilized with clay absorbant
87041522	5/05	State Compensation Ins 1275 9 th street San Francisco CA 94103	Corrosive	1 Liter	Waste hydrofluoric acid
86083984	5/06	Best Foods / CPC Int 1890 Bryant St San Francisco CA 94110	Flammable ORM-A	2x55gal 55gal	Drum #1 55gal Drum #2 55gal - Isooctane (Lab Packs) - Drum #3 55gal Chloroform 9xgal Carbon Tetrachloride
87041591	5/27	California DOHS 2151 Berkeley way Berkeley CA 94704	Flammable Poison B ORM-E Poison B	2x55gal 55gal 2x55gal 6x55gal	See Attached list
87041590	5/27	California DOHS 2151 Berkeley way Berkeley CA 94704	Poison B Flammable	12x55gal 2x55gal	See Attached list.

BAY AREA ENVIRONMENTAL

Richmond, California

SUMMARY SHEET OF WASTE RECEIVED

Receipt No.	Date	Name & Address	Type of Waste	Volume	Notes
87090502	5/28	D.O.H.S. 712-744 P street Sacramento CA 95814	ORM-E	5X55gal	Oil contaminated soil, weeds, absorbant pads, solid-A-sorb
87087175	5/28	California color 1221 California Ave Pittsburgh CA 94565	ORM-E	6X55gal	Debris contaminated with Ink.
87041530	5/18	Bard Cardio Surgery 2400 A Bisco Lane Concord CA 94560	ORM-E	10X55gal	waste resin hardener
87041532	5/19	Harding Lawson Ass. 355 A Tosconi Santa Rosa CA 94501	ORM-A	55gal	waste T.C.E.
87041593	5/28	Bart Hayward maintenance Fax 150 Sandoval way Hayward CA 94544	Flammable ORM-E Corrosive	2X55gal 5X55gal 2X55gal	waste Thinner, Non PCB Capacitors, Oil contaminated Seal, Electroplating solution.
87041529	5/18	FootHill Auction Center 16218 E. 14th Street San Leandro CA	ORM-A	55gal	sea Animals packed in Formaldehyde.
87041531	5/20	Tricom Systems 3400 Arden Rd Hayward CA 94545	ORM-E	8X55gal	surplus Tire sealant
87041534	5/21	Tricom Systems 3400 Arden Rd Hayward CA 94545	ORM-E	13X55gal	surplus Tire sealant
84797586	4/08	Peerless Lighting Corp 747 Bancroft way Berkeley CA 94710	ORM-E Flammable ORM-A	13X55gal 55gal 6X55gal	Paint filters, Paint solids waste paint waste Thinner
87041589	5/26	California color 1221 California Ave Pittsburgh CA 94565	ORM-E Combustible	7X55gal 4X55gal	waste Ink solids spent mineral spirits

Generator: California Dept. of Health Services
Laboratory waste chemicals, manifest waste number
Date:
Extremely hazardous waste permit #2-5718

Drums 55 gal DOT 17H 250 lb each Lab Pack H.M.

#1 - #8 Waste, poison B, solid, N.O.S. "Soil samples
8X55 gal contaminated with heavy metals such as arsenic,
 lead, mercury, cadmium, etc." UN 2811 Extremely
 hazardous waste permit #2-5718

- #1.....57 quart jars of soils, samples after analysis
32 quart jars of liquids, samples after analysis
absorbent = Perlite
- #2.....48 quart jars of soils, samples after analysis
8 quart jars of sludge, samples after analysis
14 quart jars of liquids, samples after analysis
absorbent = Perlite
- #3.....64 quart jars of soils, samples after analysis
7 quart jars of liquids, samples after analysis
absorbent = Perlite
- #4.....74 quart jars of soils, samples after analysis
absorbent = Perlite
- #5.....52 quart jars of soils, samples after analysis
26 quart jars of liquids, samples after analysis
absorbent = Perlite
- #6.....47 quart jars of soils, samples after analysis
15 quart jars of sludges, samples after analysis
9 quart jars of liquids, samples after analysis
absorbent = Perlite
- #7.....39 quart jars of soils, samples after analysis
22 quart jars of sludge, samples after analysis
15 quart jars of liquids, samples after analysis
absorbent = Perlite
- #8.....46 quart jars of soils, samples after analysis
10 quart jars of sludge, samples after analysis
3 quart jars of liquids, samples after analysis
absorbent = Perlite

Drums #9 - #12
4X55

55 gal DOT 17H 250 lb each
Waste, solids contaminated with less than 1%
of mixed organic solvents.

- #9.....63 quart jars of soils
- #10.....69 quart jars of soils
- #11.....42 quart jars soil, 10 quart jars sludge
- #12.....54 quart jars soil, 15 quart jars sludge

#13 & #14
2X55

55 gal DOT 17H 250 lb each
Waste, flammable liquid, N.O.S., "Mixed organic
solvents (acetone, methanol, dichloromethane,
hexane)

- #13.....(HML)
- #14.....(HML)

#15 & #16
2X55

55 gal DOT 17H 250 lbs each
Waste, flammable liquid, N.O.S., "Mixed organic
solvents (acetone, methanol, dichloromethane,
hexane)

- #15.....(CL)
- #16.....(CL)

#17
1X55

Waste, poison B, liquid N.O.S. "Soil and waste-
waters contaminated with pesticides and absorbent
materials" NA 2810
Extremely hazardous waste permit #2-5718

- #17.....8-four-liter bottles liquid lab-generated waste
- 15 quart jars of soils, samples after analysis
- 11 quart jars of liquids, samples after analysis
- 4 quart jars of sludges, samples after analysis
- absorbent = Perlite

Drum #17

55 gal DOT 17H 250 lb Lab Pack

Drums #18 - #19
2X55

55 gal DOT 17H 250lb each H.M. Lab Pack

Waste, polychlorinated biphenyls (PCBs) "Solids and
liquids contaminated with PCBs ranging from 10 ppm
to < 1 % in concentration: UN 2515 Extremely
hazardous waste permit #21-5718.

- #18.....8 quart jars of soils, samples after analysis
- 4 liquids, samples after analysis
- (remainder of drum filled with PCB tainted

glass, solids, and waste paper, etc.)
absorbent = Perlite

#19.....empty, leaking drum with residual PCB liquid

Drums #20 - #25
6X55

55 gal DOT 17H 250 lb
Waste, poison B. , N.O.S., "carcinogenic solids
in micro level quantities" NA2810

#20.....Plates 900, vials 220, tubes 900, pipet tips
80, bags 2, aminofluorene 160 lbs

#21.....Plates 500, vials 30, tubes 550, pipet tips 130
pipets 100, bottles 50, 200 lbs aminofluorene

#22.....plates 350, vials 30, tubes 550, pipets 100,
bottles 10, 170 lbs aminofluorene

#23.....plates 880, vials 50, tubes 980, pipet tips 50,
bottles 40, pipets 100, 250 lbs aminofluorene

#24.....plates 200, tubes 400, 150 lbs aminofluorene

#25.....plates approx. 1000, culture tubes 1000,
pipet tips , diesel engine oil 7 four-oz
plastic cups with lids, 4-nitroquinoline N-
oxide approx 90 micrograms total incorporated
in solid agar of approx 200 petri dishes

DRUM # /

CARCINOGENS

Solid and Liquid contaminated Materials, Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Amino Fluorene	0.2 mg	80 lbs
4 - Nitro quinoline -N- oxide	0.2 mg	300 Plates
2 - Nitro Fluorene	0.2 mg	500 Tubes
Benzo - e - pyrene	0.2 mg	20 Vials
Quercetin	2.0 mg	30 Pipets
2 - Anthramine	0.2 mg	
Sodium Azide	0.2 mg	

DRUM #

Solid and Liquid contaminated Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Amino Fluorene	0.2 mg	80 lbs
4 - Nitro quinoline -N- oxide	0.02 mg	
2 - Nitro Fluorene	0.2 mg	600 Plates
Benzo - e - pyrene	0.2 mg	200 Vials
Quercetin	0.2 mg	150 Pipettes
2,4,7, Trinitro - 9- Fluorenone	1ug	50 Pipet Tips
2 - Anthramine	0.2 mg	400 Tubes
Sodium Azide	0.2 mg	2 bags of 40 lbs

DRUM # 2

CARCINOGENS

Solid and Liquid Contaminated Materials, Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Aminofluorene	0.2 mg	150 lbs
4 - Nitroquinoline -N- Oxide	0.02 mg	150 Plates
2 - Nitrofluorene	0.2 mg	30 Vials
Benzo - e - pyrene	0.2 mg	130 Pipet Tips
Quercetin	2.0 mg	100 Pipet
2 - Anthramine	0.2 mg	550 Tubes

DRUM #

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Aminofluorene	0.2 mg	50 lbs
4 - Nitroquinoline -N- Oxide	0.02 mg	--
2 - Nitrofluorene	0.2 mg	350 Plates
Benzo - e - pyrene	0.2 mg	50 Bottles
2 - Anthramine	0.02 mg	--

Ethidiumbromide	10 mg/ml	2 liters
-----------------	----------	----------

CARCINOGENS

DRUM # 3

Solid and Liquid Contaminated Materials, Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Aminofluorene		120 lbs
4 - Nitroquinoline -N- Oxide	0.02 mg	200 Plates
2 - Nitrofluorene	0.2 mg	30 Vials
Benzo - e - pyrene	0.2 mg	100 Pipets
Quercetin	2.0 mg	200 Tubes
2 - Anthramine	0.2 mg	
Sodium Azide		

DRUM #

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Aminofluorene	0.2 mg	50 lbs
4 - Nitroquinoline -N- Oxide	0.02 mg	350 Plates
2 - Nitrofluorene	0.2 mg	350 Tubes
Benzo - e - pyrene	0.2 mg	10 Bottles
2 - Anthramine	0.2 mg	
Sodium Azide	0.2 mg	

4.

CARCINOGENS

Solid and Liquid Contaminated Materials, Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Amino Fluorene	0.2 mg	150 lbs
4 - Nitro quinoline -N- oxide	0.02 mg	2 bags/50 lbs
2 - Nitro Fluorene	0.2 mg	
Benz - e - pyrene	0.2 mg	420 Plates
Quercetin	0.2 mg	100 Pipets
2,4,7, Trinitro -9-Fluorene lug.	0.2 mg	480 Tubes
2-Anthramine	0.2 mg	50 Vials
Sodium Azide	0.2 mg	50 Pipet Tips 30 Bottles

DRUM #

CARCINOGENS

Solid and Liquid Contaminated Materials, Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Amino Fluorene	0.2 mg	100 lbs
4 - Nitroquinoline -N- Oxide	0.02 mg	400 Plates
2 - Nitrofluorene	0.2 mg	500 Tubes
Quercetin	0.2 mg	10 Bottles
Benzo - e - pyrene	0.2 mg	
2 - Anthramine	0.2 mg	

DRUM #5

CARCINOGENS

Solid and Liquid Contaminated Materials, Glassware, Solution, and Solvents

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNT</u>
2 - Aminofluorene	0.2 mg	/ 50 lbs
4 - Nitroquinoline -N- Oxide	0.02 mg	200 Plates
2 - Nitrofluorene	0.2 mg	400 Tubes
Benzo - e - pyrene	0. mg	
Quercetin	2.0 mg	
2,4,7, Trinitro - 9 - Fluorene	1 ug	
2 - Anthramine	0.2 mg	
Sodium Azide	0.2 mg	

Drum # _____

5-15-87

Hazardous Materials

Laboratory

Jane Phillips

Solid waste and engine oil, contaminated with carcinogen (NQNO), potential carcinogen (diesel soot), and potentially hazardous bacteria.

Itemized:

Solid waste - Approximately 1000 petri dishes, 1000 culture tubes, pipet tips

Liquid waste - 7 4 Oz. plastic specimen cups with lids, with diesel engine oil

Carcinogens or suspected carcinogens -

4-nitroquinoline n-oxide, approx. 90 micrograms total, incorporated in solid agar of approx 200 petri dishes.

Diesel exhaust particulate matter (soot) dissolved in dimethyl sulfoxide, approx. 40 mg total, incorporated in solid agar of approx 800 petri dishes.

Potential biohazard -

All contents contaminated with weak laboratory strains of Salmonella typhimurium.

?
~~DRUM #1~~

1 drum solvent

Mixed Organic Solvents & Oils

<u>COMPONENTS</u>	<u>CONC.</u>	<u>AMOUNTS</u>
Acetone		24 gals.
Methanol		
Dichloromethane		
Hexane		
Acetonitrile		
<hr/>		
70% Glacial Acetic Acid		3 gals.
2% Sulfuric Acid		
13% trichloroethane		
13% Methanol		
1/2% Potassium Bromide		
1/2% Gasoline		
<hr/>		
Acetone		24 gals.
Methanol		
Dichloromethane		
Hexane		
Acetonitrile		

ID
EPA CAD 073134033

Page 1 of 3
Attached sheets: 8

Generator: California Dept. of Health Services
Laboratory waste chemicals, manifest waste number
Date:
Extremely hazardous waste permit #2-5718

Drums 55 gal DOT 17H 250 lb each Lab Pack H.M.

#1 - #8 Waste, poison B, solid, N.O.S. "Soil samples
8X55 gal contaminated with heavy metals such as arsenic,
 lead, mercury, cadmium, etc." UN 2811 Extremely
 hazardous waste permit #2-5718

#1.....57 quart jars of soils, samples after analysis
32 quart jars of liquids, samples after analysis
absorbent = Perlite

#2.....48 quart jars of soils, samples after analysis
8 quart jars of sludge, samples after analysis
14 quart jars of liquids, samples after analysis
absorbent = Perlite

#3.....64 quart jars of soils, samples after analysis
7 quart jars of liquids, samples after analysis
absorbent = Perlite

#4.....74 quart jars of soils, samples after analysis
absorbent = Perlite

#5.....52 quart jars of soils, samples after analysis
26 quart jars of liquids, samples after analysis
absorbent = Perlite

#6.....47 quart jars of soils, samples after analysis
15 quart jars of sludges, samples after analysis
9 quart jars of liquids, samples after analysis
absorbent = Perlite

#7.....39 quart jars of soils, samples after analysis
22 quart jars of sludge, samples after analysis
15 quart jars of liquids, samples after analysis
absorbent = Perlite

#8.....46 quart jars of soils, samples after analysis
10 quart jars of sludge, samples after analysis
3 quart jars of liquids, samples after analysis
absorbent = Perlite

Drums #9 - #12
4X55

55 gal DOT 17H 250 lb each
Waste, solids contaminated with less than 1%
of mixed organic solvents.

- #9.....63 quart jars of soils
- #10.....69 quart jars of soils
- #11.....42 quart jars soil, 10 quart jars sludge
- #12.....54 quart jars soil, 15 quart jars sludge

#13 & #14
2X55

55 gal DOT 17H 250 lb each
Waste, flammable liquid, N.O.S., "Mixed organic
solvents (acetone, methanol, dichloromethane,
hexane)

- #13.....(HML)
- #14.....(HML)

#15 & #16
2X55

55 gal DOT 17H 250 lbs each
Waste, flammable liquid, N.O.S., "Mixed organic
solvents (acetone, methanol, dichloromethane,
hexane)

- #15.....(CL)
- #16.....(CL)

#17
1X55

Waste, poison B, liquid N.O.S. "Soil and waste-
waters contaminated with pesticides and absorbent
materials" NA 2810
Extremely hazardous waste permit #2-5718

- #17.....8-four-liter bottles liquid lab-generated waste
15 quart jars of soils, samples after analysis
11 quart jars of liquids, samples after analysis
4 quart jars of sludges, samples after analysis
absorbent = Perlite

Drum #17

55 gal DOT 17H 250 lb Lab Pack

Drums #18 - #19
2X55

55 gal DOT 17H 250lb each H.M. Lab Pack

Waste, polychlorinated biphenyls (PCBs) "Solids and
liquids contaminated with PCBs ranging from 10 ppm
to < 1 % in concentration: UN 2515 Extremely
hazardous waste permit #21-5718.

- #18.....8 quart jars of soils, samples after analysis
4 liquids, samples after analysis
(remainder of drum filled with PCB tainted

glass, solids, and waste paper, etc.)
absorbent = Perlite

#19.....empty, leaking drum with residual PCB liquid

Drums #20 - #25
6X55

55 gal DOT 17H 250 lb
Waste, poison B., N.O.S., "carcinogenic solids
in micro level quantities" NA2810

#20.....Plates 900, vials 220, tubes 900, pipet tips
80, bags 2, aminofluorene 160 lbs

#21.....Plates 500, vials 30, tubes 550, pipet tips 130
pipets 100, bottles 50, 200 lbs aminofluorene

#22.....plates 350, vials 30, tubes 550, pipets 100,
bottles 10, 170 lbs aminofluorene

#23.....plates 880, vials 50, tubes 980, pipet tips 50,
bottles 40, pipets 100, 250 lbs aminofluorene

#24.....plates 200, tubes 400, 150 lbs aminofluorene

#25.....plates approx. 1000, culture tubes 1000,
pipet tips, diesel engine oil 7 four-oz
plastic cups with lids, 4-nitroquinoline N-
oxide approx 90 micrograms total incorporated
in solid agar of approx 200 petri dishes



BAY AREA
ENVIRONMENTAL

August 3, 1987

ICF TECHNOLOGY	
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER <input checked="" type="checkbox"/> _____	DATE _____

TO: Bob Sisneros, General Manager

FROM: John Tillman, Technical Director

SUBJECT: Acid Spill Analytical Results

The following is a compilation of data obtained from samples taken on our facility during the transfer of acids by Rollins Environmental:

1. Sample taken from one of the tanks involved in the spill; CAM Analysis by Brown & Cadwell.

<u>Constituent</u>	<u>Concentration {Mg/Kg}</u>
Silver {Ag}	.2
Berilium {Be}	<.02
Cadmium {Cd}	7
Tin {Sn}	< 8
Barium {Ba}	.64
Thalium {Ta}	<.5
*Chromium {Cr}	190
Molybelem {Mo}	6
Lead {Pb}	17
Copper {Cu}	320
*Nickel {Ni}	24,000
Zinc {Zn}	120
Cobalt {Co}	59
Vanadium {Va}	1.2
Arsenic {As}	< .3
Selenium {Se}	< .4
Mercury {Hg}	2.8

*The DOHS has set limits for Cr at 560 mg/kg and Ni at 2000 mg/kg.

The following liquid samples⁵ were taken from the ground during the spillage. Five {5} samples were taken from liquid pools in the yard. BAE-001 was closest to the spill site and BAE-005 was furthest from the spill site.

Sample I.D.

Parameter
{mg/e} {Normality}

	Cr	Ni	Acidity	pH
BAE-001	150	37000		
BAE-002	160	34000		
BAE-003	130	31000		
BAE-004	120	34000		
BAE-005	120	29000	6.92	0.8

**BROWN AND CALDWELL LABORATORIES**

1255 POWELL STREET EMERYVILLE, CA 94608 • (415) 428-2300

ANALYTICAL REPORT

LOG NO: E87-07-425

Received: 23 JUL 87

Reported: 04 AUG 87

Mr. John Tillman
Bay Area Environmental
1125 Hensley Street
Richmond, California 94804

Project: 7-00199-87

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION, SOIL SAMPLES	DATE SAMPLED			
07-425-1	70-5-2(6")	21 JUL 87			
07-425-2	80-5-1(6")	21 JUL 87			
07-425-3	100-5-1(12")	21 JUL 87			
07-425-4	100-5-2(12")	21 JUL 87			
PARAMETER	07-425-1	07-425-2	07-425-3	07-425-4	
Nitric Acid Digestion, Date	07.24.87	07.24.87	07.24.87	07.24.87	
Acidity (as CaCO ₃), mg/kg	<500	<500	45000	110000	
Chromium, mg/kg	30	17	31	36	
Nickel, mg/kg	54	35	410	740	

The acidity can be converted to normality as follows:

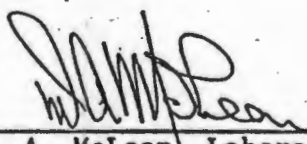
$$(N)(V) = (N)(V) \quad (0.1087)(V) = N(\text{wt}, g)$$

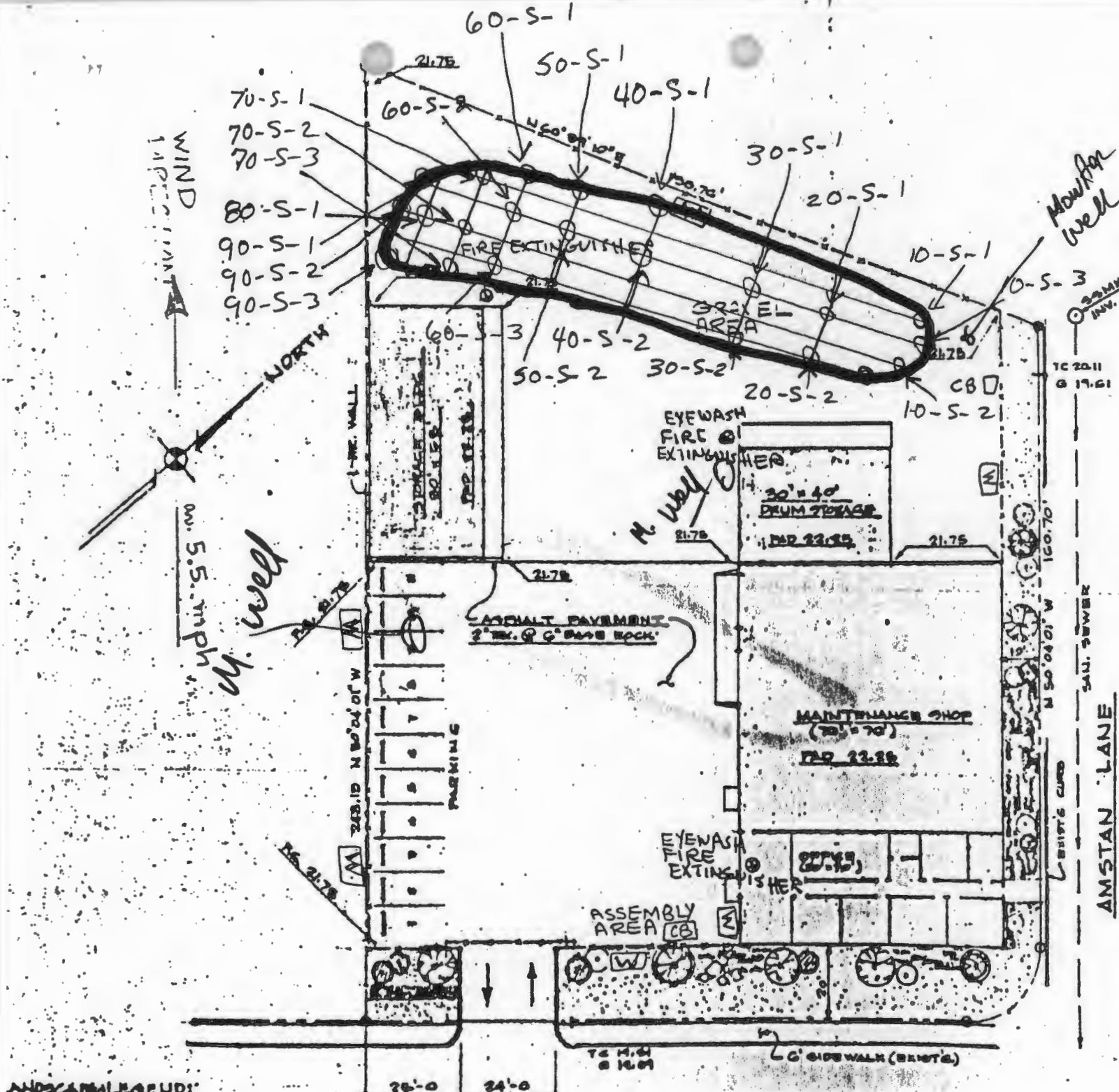
$$-1 \quad 0.005$$

$$-2 \quad 0.0$$

$$-3 \quad 0.103$$

$$-4 \quad 0.247$$


D. A. McLean, Laboratory Director

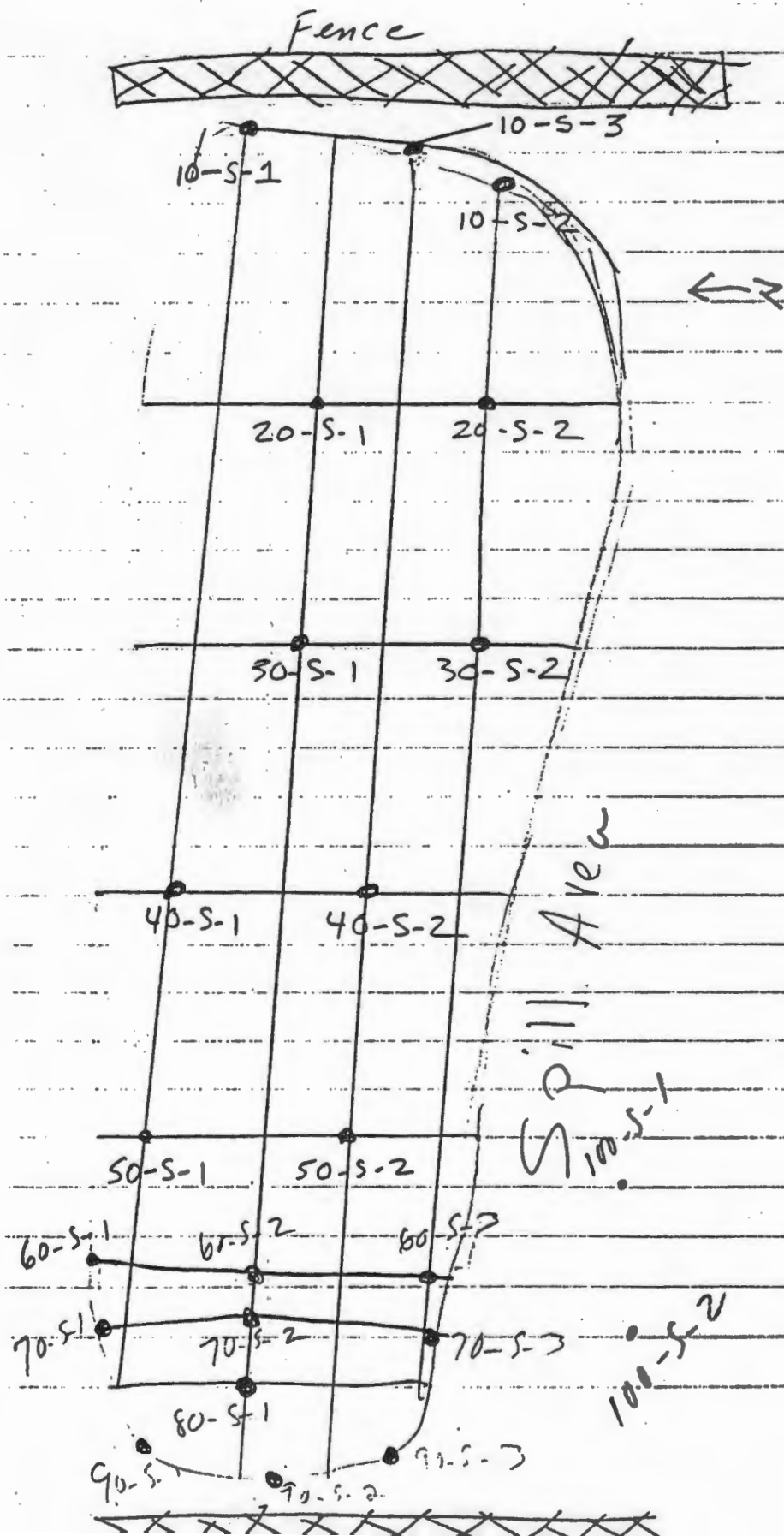


- AND CASH LEACH**
- CHAIN LINK FENCE
 - GARDENIA TREE
 - ⊗ FIRETHORN TREE
 - ① GLOSSY ABELIA TREE
 - ⊗ CLOTON TREE
 - CARMEL CHINESE GROUND COVER
 - TRAILING OXALIS GROUND COVER

HENSLEY STREET

SITE PLAN
1" = 20'

J
MADE BY
DATE 8-7
SH
VICIN



1- Effect of Ordinance No. 1648 of the City of Richmond, approving the Redevelopment Plan For Approved Redevelopment Project No. 8-A (Hensley Industrial District) recorded March 14, 1960, Book 3575, Official Records, page 186, effect of "The Official Development Plan For Approved Redevelopment Area No. 8-A (Hensley Industrial District)", recorded March 14, 1960, Book 3575, Official Records, page 194; amendment thereto recorded October 18, 1963, Book 4494, Official Records, page 546; and what appears to be a rerecording of said amendment recorded December 6, 1963, Book 4506, Official Records, page 172; amendment thereto recorded June 8, 1965, Book 4384, Official Records, page 275; amendment thereto recorded October 16, 1967, Book 5474, Official Records, page 633; amendment thereto recorded October 16, 1967, Book 5474, Official Records, page 636; amendment thereto recorded September 18, 1974, Book 7325, Official Records, page 610; and amendment thereto recorded May 5, 1980, Book 9840, Official Records, page 861.

2- Covenants, conditions and restrictions embodied in the declaration recorded November 9, 1964, Book 4739, Official Records, page 356.

No mortgage protection clause
No reversionary clause

3- Public utility easement as shown on the map of record. Affects the southeasterly 10 feet of the premises.

4- Terms, conditions and provisions embodied in the Contract For Sale from The Richmond Redevelopment Agency to the City of Richmond recorded October 26, 1972, Book 6782, Official Records, page 701.

1981-82 taxes (assessed separately)

Tax Bill No.: 561-291-024

Code Area: 8085

Land: \$21,823

TAX INFORMATION: There are no 1981-82 taxes as the premises vest in a political subdivision.

NOTE: According to the public records, there have been no deeds conveying the property described in this report recorded within a period of six months prior to the date of this report except as follows:
None

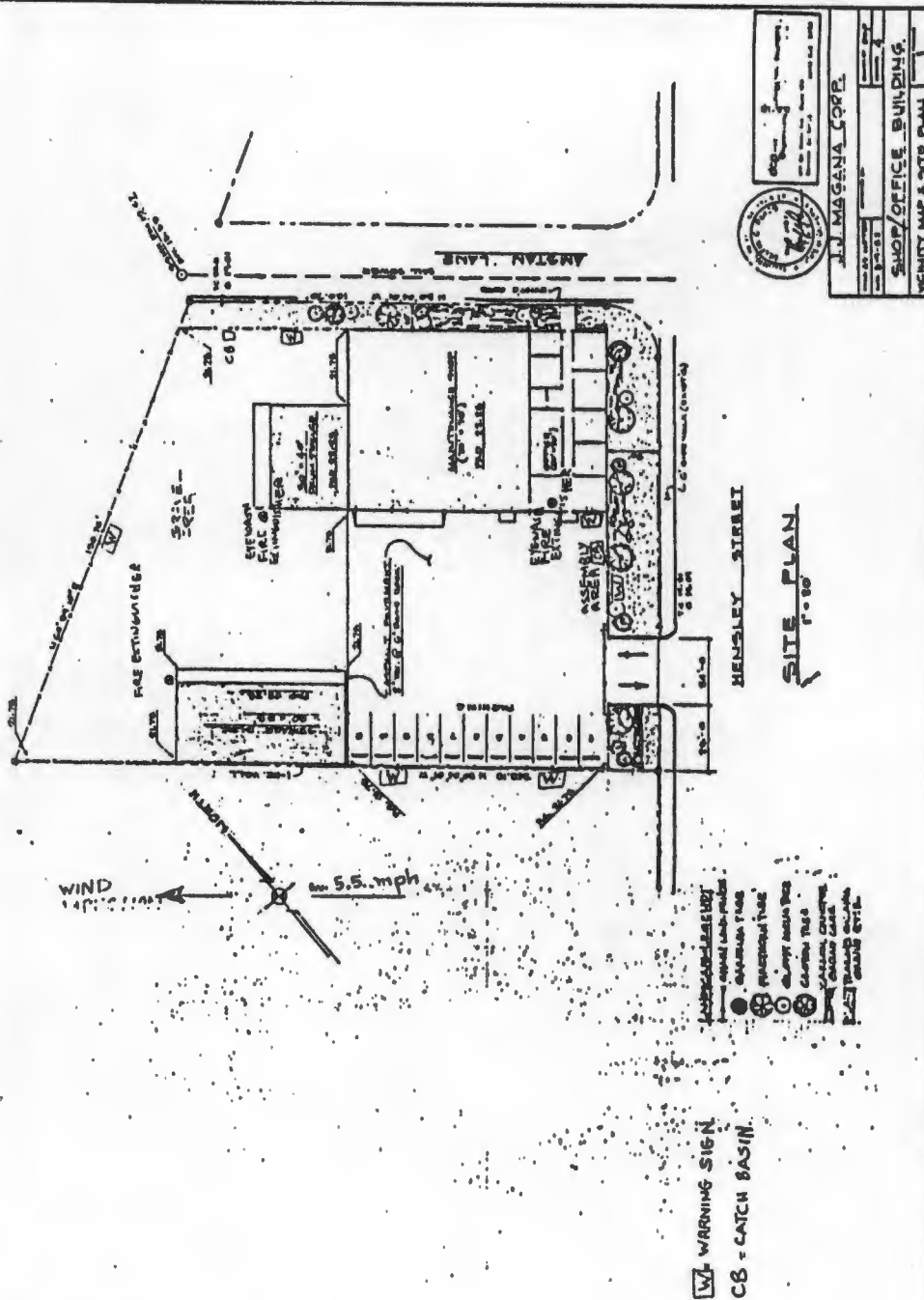
ICF	TECHNOLOGY
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER _____	DATE _____

BAE
Exhibit - G - c

That parcel of land in the City of Richmond, County of Contra Costa, State of California, described as follows:

Lot 3, Block 4, map of Subdivision 2986, filed December 9, 1964, Map Book 101, page 46, Contra Costa County records.

EXCEPTING THEREFROM: That portion thereof lying within the parcel of land described as Parcel D in the deed to American Radiator and Standard Sanitary Corporation, recorded February 8, 1966, Book 5053, Official Records, page 469.



BAY AREA ENVIRONMENTAL, INC.

RECORD OF CLIENT SEND-OUTS

SEND-OUT DATE _____

FIRM NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

TELEPHONE _____

ATTENTION OF _____ TITLE _____

COMMENTS: _____

SEND-OUT DATE _____

FIRM NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

TELEPHONE _____

ATTENTION OF _____ TITLE _____

COMMENTS: _____

SEND-OUT DATE _____

FIRM NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

TELEPHONE _____

ATTENTION OF _____ TITLE _____

COMMENTS: _____



BAY AREA
ENVIRONMENTAL

February 9, 1987

Mr. Dan F. Murphy
Department of Health Services
Toxic Substances Control Division
North Coast California Section
5850 Shellmond
Berkeley, CA 94704

Dear Mr. Murphy:

Bay Area Environmental hereby request a modification to our facility permit for storage of hazardous waste. Specifically, we want to add storage of PCB ballasts and low level PCB Lab-Pack items. Ballast would be generated as customers take old fluorescent fixtures out of service. These ballast would be drummed, and shipped out of state for disposal as solid hazardous waste.

Many analytical laboratories receive samples for PCB analysis. These laboratories lab-pack their samples for disposal, typically these lab-packs have a total PCB concentration of less than 1000 ppm. Since these wastes cannot be disposed of in California, the utilization of our transfer station is an important aspect of managing these materials.

Since these two categories of hazardous waste are packaged on the generator's facilities, there is very little risk of exposure or contamination to our facility. We recently applied for a E.H. Permit to transport ballast materials, Permit # . So if your office does not have any objections to this minor permit modification, we will begin to accept these items for storage immediately. We will limit our storage of PCB ballasts and Lab Pack items to 10 drums maximum. These items will be packaged in 17H drums or better with clay absorbents.

Sincerely,

David Burton
Facility Manager

DB/an



**BAY AREA
ENVIRONMENTAL**

MEMO TO: Jesus Magana
FROM: Bob Sisneros
SUBJECT: Acid spill on July 21, 1987 at the Bay Area Environmental Site.

July 20, 1987

- 7:00 p.m.:** Called by Jesus Magana and told of possible explosion in facility.
- 7:30 p.m.:** Arrived on scene. The following observations were made. One of the four poly tanks that had been filled the same day, which contained a combination of sulfuric, nitric and hydrochloric acids, was empty. A second one was leaking and the third and fourth tanks were swollen and appeared that they might rupture. A yellowish cloud was present.
- 7:45 p.m.:** After inspecting the facility, and determined that the tanks and material were the property of Rollins Environmental, I then called Rollins to confirm the nature of the acid and the quantity.
- 8:00 p.m.:** Spoke to Jim Wells, the project manager for Rollins, told him of the problem and requested he response with clean-up crews.
- 8:10 p.m.:** Spoke to Bruce Benike of the C.C.C. Environmental Health and told him of problem.
- 8:15 p.m.:** Third tank ruptured and started spilling acid on ground.
- 8:30 p.m.:** Terry Wells of the Magana Group assisted myself in inspecting the facility perimeter, to insure that there would be no off site contamination.
- 9:15 p.m.:** Clean-up crews began to arrive from Bay Area Environmental and Rollins Environmental. Plans were discussed as how the clean up would proceed at this time the fourth tank appeared to be leaking.
- 10:30 pm.:** Tanks were still off-gasing. Bruce Benike from C.C.C. health Dept. was on-site making assessment.
- 11:15 pm.:** Crews began spreading soda ash on acid to neutralize. Only tank #4 had any material remaining. Crews worked through the night and samples were taken for the spilled materials to determine the strength and acidity of the material.



**BAY AREA
ENVIRONMENTAL**

2:00 a.m.: I left the site with the crews still neutralizing the acid.

July 21, 1987

6:15 a.m.: Arrived back on site, assessed the clean-up actions that had taken place during the night.

6:45 a.m.: Began notifying agency.
Office of Emergency Services: spoke with Charles O'Neal
Department of Health Services: spoke to Judy Trany who asked that we contact Mark Cameran later that day. It was done. Environmental Protection Agency: spoke to answering service. Got contacted by John Gioia of our office. Bay Area Air Quality Management Board: left message on answering service, Mr. Cortez. Also spoke to Numbel Reichling at 9:00 a.m.

8:30 a.m.: Began to add additional 3000 lbs. of lime and soda ash to neutralize puddles of acid.

9:00 a.m.: Called C.R.W.Q.C.B. spoke to Hossain Kazemi said he would come out.

9:30 a.m.: Clean up continuing.

2:00 p.m.: Began to dig up dirt and load into roll-off boxes, end dumps. Removed about 50 yards.

3:15 p.m.: Hossain Kazemi of R.W.Q.C.B. arrived to assess situation, gave recommendations, and left.

3:45 p.m.: Don McClanahan of Richmond Fire Department arrived to view situation.

4:00 p.m.: Bruce Benike of C.C.C. Health arrived reviewed progress of clean-up, said he would return 7-22-87.

6:30 p.m.: Clean-up completed, site secured.

Also, see attached documents showing soil removal and sample analysis.

We will begin July 22, 1987 taking soil samples as requested by C.R.W.Q.C.B. and those analysis will be available.



BAY AREA
ENVIRONMENTAL

May 22, 1986

Mr. Dan Murphy
Toxic Substances Control Division
North Coast Section
Department of Health Services
2151 Berkeley Way, Annex 7
Berkeley, CA. 94704

Subject: Volume Reduction of Empty Containers,
Bay Area Environmental Letter of November 5, 1984,
Department of Health Services Letter of
November 14, 1985

Dear Mr. Murphy,

In reference to the above letters which I have enclosed, Bay Area Environmental is generating a number of empty containers which are considered hazardous waste, and are disposed of at a Class I disposal site.

We propose to use a crusher to reduce the volume of these empty containers and dispose of as hazardous waste. All operations will be conducted in accordance to Bay Area Environmental permit conditions.

Please review our request and inform us of your decision. If you need more information please do not hesitate to call.

Very truly yours,

Bill Wahbeh, P.E.
President

BW:csm

cc: Don Oliva



BAY AREA ENVIRONMENTAL, INC.
WASTE MANAGEMENT SERVICES

June 2, 1988

State of California
Department of Health Services
Toxic Substances Control Division
Hazardous Waste Report
P. O. Box 3000
Sacramento, CA 95812
ATTN: Mr. Robert C. Hosea

ICF	TECHNOLOGY
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER <input checked="" type="checkbox"/> _____	DATE _____

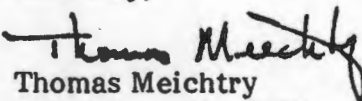
Gentlemen:

Enclosed is our Annual Facility Hazardous Waste Report from 1987, Form DHS 8363, facility EPA identification number CAT080014079.

This report will also satisfy the generator reporting requirements outlined in Section 66493 of Title 22 CCR and EPA's Biennial Generator Report.

If there are any questions regarding our report, please contact Mr. David Burton or myself at (415) 233-8001.

Sincerely,


Thomas Meichtry
Chief Executive Officer

enclosure(s)

tm/br

cc: State Water Resources Control Board
San Francisco Bay Region (2)

CALIFORNIA STATE DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION

**FACILITY HAZARDOUS WASTE
REPORT FOR 1987**

This report is for the calendar year ending December 31, 1987.
Read all instructions carefully before making any entries on this form.

GENERAL COMPANY INFORMATION AND STATUS

The front page of this report form must be completed and returned regardless of facility status.
Please print/type with elite type (12 characters per inch): One character per box.

I. FACILITY EPA I.D. NUMBER

C A T 0 8 0 0 1 4 0 7 9

II. FACILITY SIC CODE

4 2 1 4 4 2 2 6

III. COMPANY NAME

B A Y A R E A E N V I R O N M E N T A L I N C .

IV. LOCATION OF FACILITY

1 1 2 5 H E N S L E Y S T R E E T

Street

R I C H M O N D , C A 9 4 8 0 1

City or Town

State

Zip Code

Q Q

County

V. FACILITY MAILING ADDRESS (If different from Section III. above.)

Street, Route Number, or P.O. Box

City or Town

State

Zip Code

County

VI. FACILITY CONTACT

D A V I D B U R T O N

Name

O P E R A T I O N S M A N A G E R

Title

4 1 5 2 3 3 8 0 0 1

Area Code

Phone Number

VII. This EPA Number is only for hazardous waste hauling/transfer station operations

☒ No

☐ Yes—Do not complete the remainder of this form. Sign below in Section VIII. and return this page to Department of Health Services.

VIII.

I certify under penalty of law that as a senior officer, I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

A. Please Print Last Name

First Name

MI

Meichtry,

Thomas

M.

Date of Signature

0 6

Month

0 2

Day

8 8

Year

B. Signature

Title

Chief Executive Officer

IX. GENERATOR STATUS: This section is to be completed only by companies which generate hazardous waste.

- A. Does this site have an active EPA Generator Notification Statement on file?
☐ No—STOP. Do not complete rest of this section. Skip to Section X.
☐ Yes—Go to B.
- B. Was any hazardous waste generated at the site during 1987?
☐ No—Check appropriate boxes below, then go to E.
☐ 1. Generated prior to 1987 but do not expect to generate in the future because. CHECK ONE BOX BELOW.
☐ a. Waste was from one-time event(s) (e.g., spills, remedial actions, etc.)
☐ b. Processes or products changed.
☐ c. Out of business.
☐ 2. Generated prior to 1987 and expect to generate in the future.
☐ 3. Never generated before but expect to generate in the future.
☐ 4. Never generated and do not expect to generate in the future because. CHECK ONE BOX BELOW.
☐ a. Protective notifier only.
☐ b. Misunderstood the requirements.
☐ c. Notified to secure transportation services.
☐ d. Other. EXPLAIN IN COMMENTS.
☐ Yes—Go to C.
- C. How much waste was generated at the site during 1987?
☐ 1. More than 1000 kg in any month.
☐ 2. More than 100 kg but less than 1000 kg a month.
☐ 3. No more than 100 kg in any month.
- D. Were RCRA exempt hazardous wastes generated at the site during 1987?
☐ No ☐ Yes
- E. Do you wish to withdraw the site's EPA Generator Notification Statement?
☐ No ☐ Yes

X. FACILITY STATUS: This section is to be completed only by companies which treat, store, recycle, or dispose hazardous waste under ISD or permit.

- A. Does the site have an active RCRA Part A Permit or Application? No ☐ Yes ☒
- B. Did the site treat, store, dispose or recycle (TSDR) hazardous waste under ISD or permit during 1987?
☐ No Go to E. and complete only generator portions of this report form if applicable.
☒ Yes
☒ ~~XXXX~~ "California Only" wastes (stored)
☒ ~~XXXX~~ RCRA regulated wastes. (stored)
☐ TSDR only took place in RCRA exempt units.
- C. Site is closed or undergoing closure? No ☒ Yes ☐
- D. COST ESTIMATES FOR FACILITIES (Whole dollar amounts)
\$

								3	3	0	0	0
--	--	--	--	--	--	--	--	---	---	---	---	---

A. Cost Estimate for Facility Closure
\$

								1	5	0	0	0
--	--	--	--	--	--	--	--	---	---	---	---	---

B. Cost Estimate for Post Closure Monitoring and Maintenance
- E. Do you wish to withdraw the site's EPA Part A Permit Application? No ☒ Yes ☐

XI. WASTE IN TEMPORARY STORAGE

Quantity of hazardous waste on site, January 1, 1987

								1	1	1	0	0	0
--	--	--	--	--	--	--	--	---	---	---	---	---	---

--	--	--	--	--	--	--	--	--	--	--	--	--	--

lb.

Quantity of hazardous waste on site, December 31, 1987

								2	2	0	0	0	0
--	--	--	--	--	--	--	--	---	---	---	---	---	---

--	--	--	--	--	--	--	--	--	--	--	--	--	--

lb.
UOM

XII. COMMENTS

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME

BAY AREA ENVIRONMENTAL

EPA ID NO.

CA,T,0,8,0,0,1,4,0,7,9



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1987 Hazardous Waste Report

FORM
WM

WASTE MINIMIZATION

PART I

WHO MUST COMPLETE THIS FORM?

Form WM Part I, describing efforts undertaken to implement waste minimization programs, must be completed by all generators required to file an Annual/Biennial Report. This requirement was established in response to statutory provisions included in the Hazardous and Solid Waste Amendments of 1984 (HSWA).

NOTE: Generators shipping hazardous waste off site are required to certify, on item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.

INSTRUCTIONS:

Please read the detailed instructions before completing this form.

Answer questions 1 through 10. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

1. Did this site create or expand a source reduction and recycling program?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Create	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Expand	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Did this site have a written policy or statement that outlined goals, objectives and methods for source reduction and recycling of hazardous waste?

	1987	1986	Prior Years
Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

3. What was the dollar amount of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste? ENTER ZERO (0) IF NONE.

	1987	1986	Prior Years
Capital expenditures	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Operating costs	\$ <u>DK</u>	\$ <u>DK</u>	\$ <u>DK</u>

4. Did this site have an employee training program or provide incentives (bonuses, awards, personal recognition, etc.) to identify and implement source reduction and recycling opportunities and activities?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incentives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5. Did this site conduct a source reduction and/or recycling opportunity assessment or audit? Note: an opportunity assessment or audit is a procedure that identifies practices that can be implemented to reduce the generation of hazardous waste or the quantity which must subsequently be treated, stored or disposed.

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Site-Wide	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Process-Specific	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6. Did this site identify or implement new SOURCE REDUCTION opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
Implement	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>

7. What factors have delayed or prevented implementation of SOURCE REDUCTION opportunities. MARK ☒ NEXT TO ALL THAT APPLY.

- ☐ a. Insufficient capital to install new source reduction equipment or implement new source reduction practices.
- ☐ b. Lack of technical information on source reduction techniques, applicable to my specific production processes.
- ☐ c. Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- ☐ d. Concern that product quality may decline as a result of source reduction.
- ☐ e. Technical limitations of the production processes.
- ☐ f. Permitting burdens.
- ☐ g. Other (SPECIFY) N/A

8. Did this site identify or implement new RECYCLING opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site or subsequently treated, stored, or disposed of on site or off site?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
Implement	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>

9. What factors have delayed or prevented implementation of on-site or off-site RECYCLING opportunities. MARK ☒ NEXT TO ALL THAT APPLY.

- ☐ a. Insufficient capital to install new recycling equipment or implement new recycling practices.
- ☐ b. Lack of technical information on recycling techniques applicable to this site's specific production processes.
- ☐ c. Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- ☐ d. Concern that product quality may decline as a result of recycling.
- ☐ e. Requirements to manifest wastes inhibit shipments off site for recycling.
- ☐ f. Financial liability provisions inhibit shipments off site for recycling.
- ☐ g. Technical limitations of product processes inhibit shipments off site for recycling.
- ☐ h. Technical limitations of production processes inhibit on-site recycling.
- ☐ i. Permitting burdens inhibit recycling.
- ☐ j. Lack of permitted off-site recycling facilities.
- ☐ k. Unable to identify a market for recyclable materials.
- ☐ l. Other (SPECIFY) N/A

10. Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK ☒ NEXT TO ALL THAT APPLY.

	1987		1986		Prior Years		
	Technical	Financial	Technical	Financial	Technical	Financial	
a. Local government	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
b. State government	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
c. Federal government	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
d. Trade associations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
e. Educational institutions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
f. Suppliers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
g. Other parts of your firm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
h. Other firms/consultants	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
i. No request made	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>
j. Other (conferences, literature, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DK	<input type="checkbox"/>

Comments:

OVER →

Sec.
IV.

Instructions: Answer questions 1 through 4. Mark ☒ next to the effects produced by the source reduction and/or recycling activity reported on this form in Sections I through III.

1. What effect did this site's source reduction and/or recycling activity have on the quantity of water effluent produced by hazardous waste generation processes during 1987?
☐ a. Increase in the quantity of water effluent
☐ b. Decrease in the quantity of water effluent
☐ c. No effect on the quantity of water effluent
☐ d. Don't know
2. What effect did this site's source reduction and/or recycling activity have on the toxicity of water effluent produced by hazardous waste generation processes during 1987?
☐ a. Increase in the concentration of hazardous constituents
☐ b. Decrease in the concentration of hazardous constituents
☐ c. No effect on the concentration of hazardous constituents
☐ d. Don't know
3. What effect did this site's source reduction and/or recycling activity have on the quantity of air emissions produced by hazardous waste generation processes during 1987?
☐ a. Increase in the quantity of air emissions
☐ b. Decrease in the quantity of air emissions
☐ c. No effect on the quantity of air emissions
☐ d. Don't know
4. What effect did this site's source reduction and/or recycling activity have on the toxicity of the air emissions produced by hazardous waste generation processes during 1987?
☐ a. Increase in the concentration of hazardous constituents
☐ b. Decrease in the concentration of hazardous constituents
☐ c. No effect on the concentration of hazardous constituents
☐ d. Don't know

Comments:

This report is for the calendar year ending December 31, 1987.

Capacity Summary

FACILITY REPORT

I. FACILITY EPA I.D. NUMBER

QAT080014079

II. WASTE STORAGE (Complete this section for waste stored under ISD or Permit. Use whole numbers.)

Type of Storage		Average Monthly Quantity In Storage	Total Capacity	Unit of Measure
1. Container (Drum, Barrel)	(S01)			
2. Tank	(S02)			
3. Waste Pile	(S03)			
4. Surface Impoundment	(S04)			
5. Other:	(S05)			

III. WASTE DISPOSAL (Complete this section only if waste is disposed of at the facility. Use whole numbers.)

Type of Disposal		Annual Quantity Disposed	Capacity Remaining As Of December 31, 1987	Unit Of Measure
1. Injection Well	(D80)			
2. Landfill	(D81)			
3. Land Application	(D82)			
4. Ocean Disposal	(D83)			
5. Surface Impoundment	(D84)			
6. Other:	(D85)			

IV. WASTE TREATMENT (Complete this section for waste treatment methods used at the facility, include recycling. Use whole numbers.)

Treatment Method	T or R	Total Amount Treated/Recycled	Annual Capacity	Unit of Measure
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				

V. COMMENTS List any explanations or significant events which influenced capacities or throughput for Sections II-IV above. If, in Section IV, treatment code T90 is used, list the sequence of steps in the process here; i.e., T90: T31; T27; T24; T41; T40.

The waste streams reported on this page were received from an off-site generator.

Bay Area Environmental, Inc.
Facility Hazardous Waste Report
Summary of Incoming Manifests
Year Ending December 31, 1987

CAT 080014079

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Alkaline Solution (pH)=12.5) W/Metals	D002	121	S01	6,600	Pounds	X
Alkaline Solution (pH)=12.5) W/Metals	D002	121	S01	804	Gallons	X
Alkaline Solution (pH)=12.5) W/Metals	D007	121	S01	50	Gallons	X
Alkaline Solution (pH)=12.5) WO/Metals	D002	121	S01	260	Gallons	X
Alkaline Solution (pH)=12.5) WO/Metals	D002	121	S01	4,895	Pounds	X
Alkaline Solution (Unspecified)	D002	123	S01	406	Gallons	X
Alkaline Solution (Unspecified)	D002	123	S01	2,322	Pounds	X
Aqueous Solution (2(pH(12.5) W/Reactive Anions	D000	131	S01	50	Gallons	X
Aqueous Solution (2(pH(12.5) W/Reactive Anions	D002	131	S01	4	Gallons	X
Aqueous Solution (2(pH(12.5) W/Reactive Anions	D002	131	S01	100	Pounds	X
Aqueous Solution W/Metals =< Restrictive Levels	N/A	132	S01	250	Pounds	X
Aqueous Solution W/Metals =< Restrictive Levels	D002	132	S01	75	Gallons	X
Aqueous Solution W/Tot. Organ. Residues => 10%	D001	133	S01	310	Gallons	X
Aqueous Solution W/Tot. Organ. Residues => 10%	N/A	134	S01	1,200	Pounds	X
Aqueous Solution W/Tot. Organ. Residues => 10%	D002	134	S01	137	Gallons	X
Aqueous Waste (Unspecified)	N/A	135	S01	640	Gallons	X
Aqueous Waste (Unspecified)	D001	135	S01	150	Gallons	X
Aqueous Waste (Unspecified)	D001	135	S01	5,234	Pounds	X
Aqueous Waste (Unspecified)	D002	135	S01	959	Gallons	X
Off-Spec., Aged, or Surplus Inorganics	N/A	141	S01	10	Gallons	X
Off-Spec., Aged, or Surplus Inorganics	N/A	141	S01	2,155	Pounds	X
Off-Spec., Aged, or Surplus Inorganics	D001	141	S01	275	Gallons	X
Off-Spec., Aged, or Surplus Inorganics	D001	141	S01	250	Pounds	X
Off-Spec., Aged, or Surplus Inorganics	D002	141	S01	10	Gallons	X
Off-Spec., Aged, or Surplus Inorganics	D002	141	S01	1,307	Pounds	X
Asbestos - Containing Waste	N/A	151	S01	17	Cubic Yds.	X
Asbestos - Containing Waste	N/A	151	S01	31	Pounds	X
Metal Dust (See 121) & Machining Waste	D008	172	S01	2,700	Pounds	X
Other Inorganics Solid Waste	D000	181	S01	200	Pounds	X
Other Inorganics Solid Waste	D001	181	S01	30	Gallons	X
Other Inorganics Solid Waste	D001	181	S01	800	Pounds	X
Other Inorganics Solid Waste	D002	181	S01	950	Pounds	X
Other Inorganics Solid Waste	D003	181	S01	55	Gallons	X
Other Inorganics Solid Waste	None	181	S01	5,787	Pounds	X
Other Inorganics Solid Waste	P030	181	S01	200	Pounds	X

The waste streams reported on this page were received from an off-site generator.

Bay Area Environmental, Inc.
Facility Hazardous Waste Report
Summary of Incoming Manifests
Year Ending December 31, 1987

CAT 080014079

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Halogenated Solvents (chloroform, methychloride)	F001	211	S01	1,080	Gallons	X
Halogenated Solvents (chloroform, methychloride)	F001	211	S01	3,100	Pounds	X
Halogenated Solvents (chloroform, methychloride)	F002	211	S01	896	Gallons	X
Halogenated Solvents (chloroform, methychloride)	F002	211	S01	6,856	Gallons	X
Halogenated Solvents (chloroform, methychloride)	U221	211	S01	10	Gallons	X
Oxygenated Solvents (acetone, butanol, etc.)	D001	212	S01	1,940	Gallons	X
Oxygenated Solvents (acetone, butanol, etc.)	D001	212	S01	530	Pounds	X
Hydrocarbon Solvents (benzene, hexane, etc.)	D001	213	S01	5,806	Gallons	X
Hydrocarbon Solvents (benzene, hexane, etc.)	D001	213	S01	160	Liquid Lite	X
Hydrocarbon Solvents (benzene, hexane, etc.)	D001	213	S01	9,181	Pounds	X
Unspecified Solvent Mixture	D001	214	S01	2,021	Gallons	X
Unspecified Solvent Mixture	D001	214	S01	37,875	Pounds	X
Waste Oil / Mixed Oil	D001	221	S01	8,690	Gallons	X
Waste Oil / Mixed Oil	D001	221	S01	35,318	Pounds	X
Oil/Water Separation Sludge	D001	222	S01	25	Cubic Yds.	X
Oil/Water Separation Sludge	D001	222	S01	3,700	Gallons	X
Unspecified Oil Containing Waste	D001	223	S01	4	Cubic Yds.	X
Unspecified Oil Containing Waste	D001	223	S01	1,505	Gallons	X
Unspecified Oil Containing Waste	D001	223	S01	33,855	Pounds	X
Pesticide Rinse Water	D002	231	S01	50	Gallons	X
Pesticide Rinse Water	D002	231	S01	688	Pounds	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	D000	232	S01	126	Gallons	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	D000	232	S01	700	Pounds	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	D001	232	S01	745	Gallons	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	D001	232	S01	350	Pounds	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	F001	232	S01	34,200	Pounds	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	P030	232	S01	185	Gallons	X
Pesticides/Other Waste Assoc. W/Pesticide Prod.	P030	232	S01	845	Pounds	X
Other Still Bottom Waste	F002	252	S01	55	Gallons	X
Other Still Bottom Waste	P030	232	S01	55	Gallons	X
PCB's & Material Containing PCB's	N/A	261	S01	6,400	Pounds	X
Polymeric Resin Waste	D001	272	S01	1,735	Gallons	X
Polymeric Resin Waste	D001	272	S01	171,218	Pounds	X
Adhesives	N/A	281	S01	350	Pounds	X
Adhesives	D001	281	S01	9,450	Pounds	X

The waste streams reported on this page were received from an off-site generator.

Bay Area Environmental, Inc.
Facility Hazardous Waste Report
Summary of Incoming Manifests
Year Ending December 31, 1987

CAT 000014079

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Latex Waste	N/A	291	S01	160	Gallons	X
Latex Waste	N/A	291	S01	3,600	Pounds	X
Biological Waste other than Sewage Waste	U122	322	S01	7,350	Pounds	X
Off-Spec., Aged or Surplus Organics	N/A	331	S01	1,294	Gallons	X
Off-Spec., Aged or Surplus Organics	N/A	331	S01	250	Pounds	X
Off-Spec., Aged or Surplus Organics	D001	331	S01	75	Gallons	X
Off-Spec., Aged or Surplus Organics	D001	331	S01	6,961	Pounds	X
Off-Spec., Aged or Surplus Organics	D002	331	S01	439	Gallons	X
Off-Spec., Aged or Surplus Organics	D002	331	S01	450	Pounds	X
Off-Spec., Aged or Surplus Organics	D007	331	S01	2,000	Pounds	X
Organic Liquids (Nonsolvents) W/Halogens	D000	341	S01	361	Gallons	X
Organic Liquids (Nonsolvents) W/Halogens	D001	341	S01	50	Gallons	X
Organic Liquids W/Metals (See 121)	U122	342	S01	165	Gallons	X
Organic Liquid Mixture (Unspecified)	N/A	343	S01	345	Gallons	X
Organic Liquid Mixture (Unspecified)	D001	343	S01	710	Gallons	X
Organic Liquid Mixture (Unspecified)	D001	343	S01	1,500	Pounds	X
Organic Liquid Mixture (Unspecified)	D002	343	S01	185	Gallons	X
Organic Liquid Mixture (Unspecified)	F009	343	S01	3,600	Pounds	X
Organic Solids W/Halogens	D001	351	S01	696	Gallons	X
Calcium Hypochlorite	D003	352	S01	1,210	Gallons	X
Calcium Hypochlorite	D003	352	S01	65,667	Pounds	X
Lime Sludge	D002	421	S01	2,950	Pounds	X
Sulfur Sludge	N/A	441	S01	4,000	Pounds	X
Degreasing Sludge	F001	451	S01	2	Gallons	X
Degreasing Sludge	F001	451	S01	150	Pounds	X
Paint Sludge	D001	461	S01	7,015	Pounds	X
Sludge Waste (Unspecified)	N/A	491	S01	4,198	Pounds	X
Sludge Waste (Unspecified)	D001	491	S01	158	Gallons	X
Empty Pesticide Containers >= 30 Gallons	N/A	511	S01	1,640	Pounds	X
Other Empty Pesticide Containers >= 30 Gallons	N/A	512	S01	43,074	Pounds	X
Empty Containers >= 30 Gallons	N/A	513	S01	1	Cubic Yd.	X
Empty Containers >= 30 Gallons	N/A	513	S01	4,137	Pounds	X

The waste streams reported on this page were received from an off-site generator.

Bay Area Environmental, Inc.
Facility Hazardous Waste Report
Summary of Incoming Manifests
Year Ending December 31, 1987

CAT 080014079

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Chemical Toilet Waste	D002	531	S01	3,013	Pounds	X
Photochemicals / Photoprocessing Waste	D002	541	S01	356	Gallons	X
Laboratory Waste Chemicals	N/A	551	S01	1,071	Gallons	X
Laboratory Waste Chemicals	N/A	551	S01	9,471	Pounds	X
Laboratory Waste Chemicals	D000	551	S01	2,475	Gallons	X
Laboratory Waste Chemicals	D000	551	S01	1,000	Pounds	X
Laboratory Waste Chemicals	D001	551	S01	827	Gallons	X
Laboratory Waste Chemicals	D001	551	S01	6,806	Pounds	X
Laboratory Waste Chemicals	D002	551	S01	476	Gallons	X
Laboratory Waste Chemicals	D002	551	S01	6,392	Pounds	X
Laboratory Waste Chemicals	D004	551	S01	4	Gallons	X
Laboratory Waste Chemicals	D007	551	S01	6	Gallons	X
Laboratory Waste Chemicals	D009	551	S01	1,400	Pounds	X
Laboratory Waste Chemicals	F001	551	S01	30	Gallons	X
Laboratory Waste Chemicals	P030	551	S01	62	Gallons	X
Laboratory Waste Chemicals	P030	551	S01	1,620	Pounds	X
Laboratory Waste Chemicals	U122	551	S01	260	Gallons	X
Laboratory Waste Chemicals	U122	551	S01	250	Pounds	X
Detergent and Soap	D002	561	S01	330	Gallons	X
Detergent and Soap	D002	561	S01	130	Pounds	X
Contaminated Soil From Site Clean-Ups	N/A	611	S01	182,600	Pounds	X
Contaminated Soil From Site Clean-Ups	D000	611	S01	1,500	Pounds	X
Contaminated Soil From Site Clean-Ups	D001	611	S01	4,600	Pounds	X
Contaminated Soil From Site Clean-Ups	D002	611	S01	350	Pounds	X
Contaminated Soil From Site Clean-Ups	D007	611	S01	1,400	Pounds	X
Contaminated Soil From Site Clean-Ups	D008	611	S01	30,000	Pounds	X
Contaminated Soil From Site Clean-Ups	D009	611	S01	150	Pounds	X
Household Wastes	N/A	612	S01	715	Gallons	X
Household Wastes	N/A	612	S01	16,900	Pounds	X
Household Wastes	D000	612	S01	15	Cubic Yds.	X
Household Wastes	D000	612	S01	42,000	Pounds	X
Household Wastes	D001	612	S01	120	Gallons	X
Household Wastes	D001	612	S01	350	Pounds	X
Household Wastes	D002	612	S01	60	Gallons	X
Household Wastes	D002	612	S01	2,500	Pounds	X
Household Wastes	F001	612	S01	20	Gallons	X
Liquid Cyanide Solution	D000	711	S01	50	Pounds	X
Liquid Cyanide Solution	P030	711	S01	840	Gallons	X
Liquid Cyanide Solution	P030	711	S01	700	Pounds	X
Acid Waste pH (< 2 W/Metals	D002	791	S01	1,924	Gallons	X
Acid Waste pH (< 2 W/Metals	D002	791	S01	3,000	Pounds	X

The waste streams reported on this page were received from an off-site generator.

Bay Area Environmental, Inc.
 Facility Hazardous Waste Report
 Summary of Incoming Manifests
 Year Ending December 31, 1987

CAT 080014079

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Acid Waste pH (<= 2 W/Metals	D002	792	S01	55	Gallons	X
Acid Waste pH (<= 2 W/Metals	D002	792	S01	1,300	Pounds	X
Acid Waste pH (<= 2 W/Metals	D007	792	S01	55	Gallons	X

Bay Area Environmental, Inc.
Facility Hazardous Waste Report
Summary of Outgoing Manifests
Year Ending December 31, 1987

CAT 080014079

The waste streams reported on this page were generated on the facility.

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Alkaline Solution (pH)=12.5) W/Metals	D002	121	D81	5	Gallons	X
Alkaline Solution (pH)=12.5) W/Metals	D002	121	D81	1,200	Pounds	X
Alkaline Solution (pH)=12.5) W/Metals	D002	121	D84	750	Gallons	X
Alkaline Solution (pH)=12.5) WO/Metals	D002	122	D81	13,460	Pounds	X
Alkaline Solution (Unspecified)	D002	123	D81	500	Pounds	X
Alkaline Solution (Unspecified)	F004	123	T07	850	Gallons	X
Alkaline Solution (Unspecified)	D002	123	T21	5	Gallons	X
Aqueous Solution (2(pH(12.5) W/Reactive Anions	D002	131	D81	900	Pounds	X
Aqueous Solution W/Metals =< Restrictive Levels	D002	132	T21	3,000	Gallons	X
Aqueous Solution W/Total Organ. Residues =< 10%	D001	134	D84	100	Gallons	X
Aqueous Solution W/Total Organ. Residues =< 10%	N/A	134	T21	800	Gallons	X
Aqueous Waste (Unspecified)	N/A	135	D80	450	Gallons	X
Off-Spec., Aged, or Surplus Inorganics	N/A	141	D81	200	Pounds	X
Off-Spec., Aged, or Surplus Inorganics	D000	141	D81	200	Pounds	X
Off-Spec., Aged, or Surplus Inorganics	D002	141	D81	2,050	Pounds	X
Off-Spec., Aged, or Surplus Inorganics	D000	141	T31	88	Pounds	X
Asbestos-Containing Waste	N/A	151	D81	19	Cubic Yds.	X
Inorganic Solid Waste - Other	D000	181	D81	400	Pounds	X
Inorganic Solid Waste - Other	D002	181	D81	15,200	Pounds	X
Inorganic Solid Waste - Other	P030	181	D81	200	Pounds	X
Halogenated Solvents (chloroform, methylchloride)	U211	211	D81	1	Gallons	X
Halogenated Solvents (chloroform, methylchloride)	F001	211	R10	405	Gallons	X
Halogenated Solvents (chloroform, methylchloride)	F001	211	T07	530	Gallons	X
Halogenated Solvents (chloroform, methylchloride)	F002	211	T07	700	Gallons	X
Halogenated Solvents (chloroform, methylchloride)	U226	211	T07	100	Gallons	X
Halogenated Solvents (chloroform, methylchloride)	F001	211	T16	220	Gallons	X
Halogenated Solvents (chloroform, methylchloride)	F002	211	T16	275	Gallons	X
Oxygenated Solvents (acetone, butanol, etc.)	D001	212	T16	2,265	Gallons	X
Hydrocarbon Solvents (benzene, hexane, etc.)	D001	213	T16	2,204	Gallons	X
Solvent Mixture (Unspecified)	D001	214	D81	6,000	Pounds	X
Solvent Mixture (Unspecified)	D001	214	T06	495	Gallons	X
Solvent Mixture (Unspecified)	D001	214	T16	4,710	Gallons	X
Waste Oil / Mixed Oil	D001	221	D81	30,150	Pounds	X
Waste Oil / Mixed Oil	D001	221	R11	8,107	Gallons	X

Bay Area Environmental, Inc.
 Facility Hazardous Waste Report
 Summary of Outgoing Manifests
 Year Ending December 31, 1987

CAT 000014079

The waste streams reported on this page were generated on the facility.

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Waste Oil / Mixed Oil	D001	221	T16	1,710	Gallons	X
Oil / Water Separation Sludge	D001	222	D81	10,000	Pounds	X
Oil / Water Separation Sludge	D001	222	T21	2,700	Gallons	X
Unspecified Oil Containing Waste	D001	223	D81	50,000	Pounds	X
Unspecified Oil Containing Waste	D001	223	R11	625	Gallons	X
Pesticides / Other Waste Assoc. W/Pesticide Prod.	D000	232	D81	300	Pounds	X
Pesticides / Other Waste Assoc. W/Pesticide Prod.	D001	232	D81	500	Pounds	X
Pesticides / Other Waste Assoc. W/Pesticide Prod.	None	232	T07	2,325	Gallons	X
Tank Bottom Waste	N/A	241	D81	10,000	Pounds	X
Still Bottoms W/Halogenated Organics	F001	251	D81	900	Pounds	X
PCB's / Material Containing PCB's	D001	261	D81	3,500	Pounds	X
Polymeric Resin Waste	D001	272	D81	269,200	Pounds	X
Latex Waste	N/A	291	T16	3,150	Pounds	X
Biological Waste other than Sewage Waste	U122	322	D81	14,130	Pounds	X
Off-Spec., Aged, or Surplus Organics	None	331	T21	1,155	Gallons	X
Off-Spec., Aged, or Surplus Organics	P030	331	T27	110	Gallons	X
Off-Spec., Aged, or Surplus Organics	U122	331	T27	165	Gallons	X
Organic Liquids (nonsolvents) W/Halogens	F001	341	T07	590	Gallons	X
Organic Liquid Mixture (Unspecified)	D001	343	D81	5	Gallons	X
Organic Liquid Mixture (Unspecified)	D001	343	D81	800	Pounds	X
Organic Liquid Mixture (Unspecified)	D001	343	R11	5,640	Gallons	X
Organic Liquid Mixture (Unspecified)	D001	343	T07	220	Gallons	X
Organic Liquid Mixture (Unspecified)	D001	343	T16	5,419	Gallons	X
Calcium Hypochlorite	D003	352	D80	50	Gallons	X
Calcium Hypochlorite	D003	352	D81	1,980	Gallons	X
Calcium Hypochlorite	D003	352	D81	11,800	Pounds	X
Calcium Hypochlorite	D003	352	T31	6,627	Pounds	X
Line Sludge	D002	421	D81	6,500	Pounds	X
Paint Sludge	D001	461	D81	79,600	Pounds	X
Paint Sludge	D001	461	T07	2,500	Gallons	X
Paint Sludge	D001	461	T16	200	Gallons	X
Sludge Waste (Unspecified)	D001	491	T06	110	Gallons	X

Bay Area Environmental, Inc.
Facility Hazardous Waste Report
Summary of Outgoing Manifests
Year Ending December 31, 1987

CAT 000014079

The waste streams reported on this page were generated on the facility.

Description	Waste # EPA	Waste # State	Handling Method	Amount Of Waste	Units of Measure	Shipped Off Site
Empty Containers (Other) >= 30 Gallons	N/A	512	D81	160	Cubic Yds.	X
Empty Containers (Other) >= 30 Gallons	N/A	512	D81	10,240	Pounds	X
Empty Containers < 30 Gallons	N/A	513	D81	2,064	Pounds	X
Photochemicals / Photoprocessing Waste	D002	541	T16	300	Pounds	X
Laboratory Waste Chemicals	D000	551	D81	1	Gallons	X
Laboratory Waste Chemicals	D000	551	D81	10,026	Pounds	X
Laboratory Waste Chemicals	D001	551	D81	2	Gallons	X
Laboratory Waste Chemicals	D001	551	D81	21,425	Pounds	X
Laboratory Waste Chemicals	D002	551	D81	1	Gallons	X
Laboratory Waste Chemicals	D002	551	D81	11,151	Pounds	X
Laboratory Waste Chemicals	D009	551	D81	4,100	Pounds	X
Laboratory Waste Chemicals	P030	551	D81	600	Pounds	X
Laboratory Waste Chemicals	U122	551	D81	3,900	Pounds	X
Laboratory Waste Chemicals	D000	551	T07	5	Gallons	X
Laboratory Waste Chemicals	D001	551	T07	15	Gallons	X
Laboratory Waste Chemicals	D001	551	T07	3,200	Pounds	X
Contaminated Soil From Site Clean-ups	N/A	611	D81	35	Cubic Yds.	X
Contaminated Soil From Site Clean-ups	N/A	611	D81	47,000	Pounds	X
Contaminated Soil From Site Clean-ups	D000	611	D81	14,600	Pounds	X
Contaminated Soil From Site Clean-ups	D001	611	D81	32,000	Pounds	X
Contaminated Soil From Site Clean-ups	D002	611	D81	9,500	Pounds	X
Contaminated Soil From Site Clean-ups	D006	611	D81	3,000	Pounds	X
Household Waste	N/A	612	D81	20	Cubic Yds.	X
Household Waste	N/A	612	D81	10,000	Pounds	X
Household Waste	D001	612	D81	8,550	Pounds	X
Household Waste	D002	612	D81	1,000	Pounds	X
Household Waste	P030	612	D81	4,000	Pounds	X
Liquid Cyanide Solution	D003	711	T21	950	Gallons	X
Acid Waste pH (<= 2	D002	791	D84	35	Gallons	X
Acid W/Metals pH (<= 2	D002	792	T31	1,850	Gallons	X

BAY AREA ENVIRONMENTAL, Hazardous Waste Transfer-Storage Facility

1125 Hensley Street
Richmond, CA 94804
Phone (415) 235-9422

Mailing Address:
P. O. Box 579
San Pablo, CA 94806

June 15, 1984

Computers Science Corporation
Environmental Protection Agency
215 Fremont St.
San Francisco, CA 94105

Attn: Ms. Lisa Yeh

RE: Bay Area Environmental
EPA ID No.: CAT 080014079

Dear Ms. Yeh:

This letter confirms our telephone conversation on Thursday, June 14, 1984, concerning the location of Bay Area Environmental.

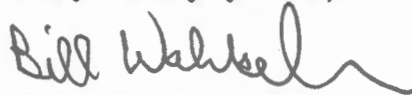
The original application had 225 Parr Blvd. as its address. During the permitting process we changed the facility's address to 1125 Hensley St., Richmond, CA 94804.

A permit was issued on August 2, 1983 for the new location.

Please update your records to reflect this change.

If you need more information please call Mr. Donald Oliva at (415) 235-9422.

Very truly yours,



Bill Wahbeh, P.E.
President

BW/cms

cc: D. Oliva
Mr. Wil Bruhns

RESPONDENT CONTACT RECORD

FACILITY ID NUMBER

CAT080014079

COMPANY NAME

BAY AREA ENVIRONMENTAL

COMPANY ADDRESS

225 PARR BLVD

CITY

RICHMOND

STATE

CA

ZIP CODE

94801

CONTACT PERSON'S NAME/TITLE

BILL WAHBEH

TELEPHONE NUMBER

(415) 235 - 1393

CONTACT RECORD

DATE	CONTRACTOR'S INITIALS	ITEMS DISCUSSED/RESOLUTION
6/14/84	LY	call for the address change, but 415-235-1393 ^(no of O Erickson) data neither not attach to the current address ^{nor} facility.
6/14/84	LY	Later I called information, and get Tel: 235-9422, and also get contact with Bill Wahbeh. He will send in a letter stays the original address is closed, and the new address is 1125 Hendley St. I will send them a new notification.
6/14/84	LY	The new notification is sent out to ^{the facility} Bill today.
6/14/84	UB	Spoke w/ Mr. Wahbeh - Bay Area Environ. had orig. intended to open up a facility at 225 Parr Blvd on land owned by O Erickson Inc. O. Erickson decided not to go through with this agreement, consequently Bay Area Environ. started up their facility at 1125 Hendley, Richmond, CA.

BAY AREA ENVIRONMENTAL

P. O. Box 579
San Pablo, CA 94806

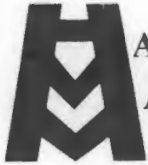


Computers Science Corporation
Environmental Protection Agency
215 Fremont St.
San Francisco, CA 94105

Attn: Ms. Lisa Yeh



CASTO80014079



**HAZARDOUS
MATERIALS
MANAGEMENT INC.**

P.O. BOX 2026 CASTRO VALLEY, CA 94546 (415) 922-1171
233-8001

April 29, 1981

Mr. W. Wilson
EPA Region IX
Attn: A-3-2
215 Fremont Street,
San Francisco, CA 94105

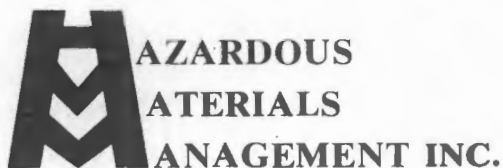
Dear Wilson:

Enclosed you will find permit application for Bay Area
Environmental. If you need more information, please call
me.

Very truly yours

Bill Wahbeh, P.E.

Enclosures.



P.O. BOX 2026 CASTRO VALLEY, CA 94546 (415) 582-8171

1/6
Not in Files yet.

Dec. 31, 1980

EPA Region IX
Attn: A-3-2
215 Fremont Street,
San Francisco, CA 94105

Subject: Bay Area Environmental
Notification of Hazardous Waste Activity

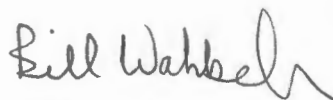
EPA No. CAT 080014079

Please add to our Notification of Hazardous Waste Activity
application Section VI:

A. Generation

As marked on the application form enclosed.

Thank you.


Bill Wahbeh

NW/mw

Enclosures



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

**INSTALLA-
TION'S EPA
I.D. NO.**

1. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

LOCATION OF INSTALLATION

CAT 080014079

BAY AREA ENVIRONMENTAL
253 TEWKSBURY AVE.
RICHMOND - CA. 94801

~~PLEASE PLACE LABEL IN THIS SPACE~~

225 PARR BLVD.
RICHMOND - CA. 94801

FOR OFFICIAL USE ONLY

COMMENTS

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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INSTALLATION'S EPA I.D. NUMBER										APPROVED		DATE RECEIVED (yr., mo., & day)		
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I. NAME OF INSTALLATION

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II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX															
0	A	S	3		T	E	K	V	B	E	R	I	N	G	

CITY OR TOWN															ST.		ZIP CODE							
4	R	I	C	H	M	O	N	D									C	A	S		4	8	0	

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER																				
5	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0
1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0	

CITY OR TOWN																ST.		ZIP CODE			
C																					
S	R	I	C	H	M	O	N	D								C	A	9	4	8	0
13	16															40	41	42	47	-	51

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)																		PHONE NO. (area code & no.)											
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
B	J	L		W	A	H	B	E	H									4	1	5		2	3	5		1	3	9	3

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER	
08	ERICKSON INC

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)	VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
--	--

☒ **A. GENERATION**☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ ⁴¹ A. AIR ☐ ⁴² B. RAIL ☒ ⁴³ C. HIGHWAY ☐ ⁴⁴ D. WATER ☐ ⁴⁵ E. OTHER (specify):

/III. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. NO.

A. FIRST NOTIFICATION

☐ **B. SUBSEQUENT NOTIFICATION** (complete item C)

X. DESCRIPTION OF HAZARDOUS WASTES

lease go to the reverse of this form and provide the requested information.

I.D. FOR OFFICIAL USE ONLY													
5													T/A C
W													1
1	2											13	14 15

X. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 F006 23 - 26	3 F007 23 - 26	4 F008 23 - 26	5 F009 23 - 26	6 F012 23 - 26
7 F015 23 - 26	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U030 23 - 26	32 U239 23 - 26	33 U220 23 - 26	34 U012 23 - 26	35 U019 23 - 26	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

C. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE Bill Wahbehl	NAME & OFFICIAL TITLE (type or print) BILL WAHBEHL - CONSULTANT	DATE SIGNED 12-12-80
---------------------------	--	-------------------------

RECEIVED MAR 23 1989



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

THOMAS MEICHTRY

Mr. ~~Don Ohua~~, Plant Manager
Bay Area Environmental
~~P.O. Box 579~~
~~San Pablo, CA 94806~~

Dear Mr. ~~Ohua~~:

CERTIFIED MAIL NO. P 765 057 329
RETURN RECEIPT REQUESTED

ICF TECHNOLOGY

DOCUMENT SOURCE

DOHS _____ RWQCB _____
OTHER ☒ DATE _____

1125 Hensley St

Under EPA's Environmental Priorities Initiative, EPA's contractor, Ecology and Environment, Inc. is currently conducting an investigation of your facility at 225 Park Blvd., Richmond, CA. The Environmental Priorities Initiative (EPI) is an integrated RCRA/CERCLA system to identify and focus resources for clean up on the most environmentally significant sites first.

As part of this investigation, your facility is requested to provide information regarding past and current Solid Waste Management units (SWMUs). For purposes of this letter, a SWMU is defined in RCRA as any discernible waste management unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste.

You are hereby requested to provide information on SWMUs exclusive of any Part B Permit Application submittal. Please provide all information requested in Enclosures A and B which are enclosed with this letter. In addition, please have a responsible company official sign and certify your response at page 3 of Enclosure A. Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927, EPA requests that you provide this information within thirty (30) days from receipt of this letter. You should note that information regarding SWMUs must be provided for all past and current processes at your facility since operations began.

Your failure to respond fully to this information request may result in the initiation of civil enforcement proceedings against you under the authority of Section 3008 of RCRA, 42 U.S.C. Section 6928.

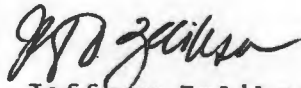
All information that you provide to EPA will be subject to public disclosure, to the extent provided by RCRA and the Freedom of Information Act, 5 U.S.C. Section 552 and EPA's Business

Confidentiality Regulations, 40 C.F.R. Part 2 (in particular, 40 C.F.R. Sections 2.202 et seq. and 2.305). To claim confidentiality you must clearly identify the information to which the claim applies. Information covered by a confidentiality claim will be disclosed by EPA only to the extent and by means of procedures set forth in 40 C.F.R. Part 2.

If no claim of confidentiality accompanies the information when it is submitted, EPA may make the information available to the public without further notice to you.

Should you have any questions pertaining to this matter, please feel free to contact Paul La Courreye or Thomas Mix of the Superfund Program Office, at (415) 974-7198 and 974-7414, respectively. Please send your response to: Environmental Protection Agency - Attn: Paul La Courreye, Site Evaluation Section (T-4-7), 215 Fremont Street, San Francisco, CA 94105.

Sincerely,



Jeffrey Zelikson
Director

Hazardous Waste Management Division

Enclosures

cc: Karen Schwinn, Chief, U.S. EPA Waste Compliance Branch
Stephen Richie, Executive Officer, Regional Water Quality
Control Board, San Francisco Bay Region
Mike James, Chief, Permitting Unit, Dept. of Health
Services, Emeryville

INFORMATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: BAY AREA ENVIRONMENTAL
EPA I.D. NUMBER: CAT # 080014079
LOCATION City RICHMOND, CA 94608
State CALIFORNIA

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A OR B APPLICATION

	<u>Yes</u>	<u>No</u>
• Landfill	—	<u>X</u>
• Surface Impoundment	—	<u>X</u>
• Land Farm	—	<u>X</u>
• Incinerator	—	<u>X</u>
• Storage Tank (Above Ground)	—	<u>X</u>
• Storage Tank (Underground)	—	<u>X</u>
• Container Storage Area	<u>Y</u>	—
• Injection Wells	—	<u>X</u>
• Wastewater Treatment Units	—	<u>X</u>
• Transfer Stations	<u>X</u>	—
• Waste Recycling Operations	—	<u>X</u>
• Other Waste Handling Areas Not Covered Above	—	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous waste or hazardous constituents under RCRA. Also, include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

SEE ATTACHED ANNUAL REPORT 1987

NOTE: Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A or B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information:

- Date of release
- Type of waste released
- Quantity or volume of waste released
- Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

July 20, 1987
 June 23, 1988
 Sept 7, 1988
 JAN 6, 1989

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE

5. Describe the approximate dates and locations of product spills and releases which have occurred or are recurring at your facility and any cleanup operations which have occurred relative to these incidents.

(ATTACHED)

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer, of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Thomas M. Meichtry
Signature
THOMAS M. MEICHTRY
PRESIDENT & CEO
Name and Title (Typed)

INSTRUCTION FOR COMPLETING ENCLOSURE A
"INFORMATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS"

Prior to any final determination regarding your interim status permit, we must assess any past releases of hazardous waste or constituents from any active or closed solid or hazardous waste management unit(s) on the facility property. In order to accomplish this, you are requested to submit the following information:

- 1) For all waste handling units on your property (including landfills, storage facilities, waste piles, surface impoundments, wastewater treatment units, injection wells, transfer facilities, resource recovery facilities, and any other waste handling operation), identify all past and present releases and spills of waste material. Include both solid and hazardous wastes. Give the approximate dates and locations of each spill or release.
- 2) List the approximate dates and locations of product spills, leaks, releases, and drippings (other than into a product tank) which have occurred or are recurring at your facility.
- 3) Identify all areas on your facility property where any products or wastes have been buried, impounded, spilled, or leaked.
- 4) For all items identified above, describe the composition of the material and the process or activity from which it resulted or in which it was used.

All facility records should be reviewed in obtaining the requested information, including the personal recollection of longtime employees and past owners and operators. This information is requested under the authority of Section 3007 of RCRA. A handler of hazardous waste who fails to provide information requested under Section 3007 violates the law and may be subject to enforcement action, including administrative penalties, under Section 3008 of RCRA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

CERTIFIED MAIL NO. P 765 057 323
RETURN RECEIPT REQUESTED

Mr. Don Ohua, Plant Manager
Bay Area Environmental
P.O. Box 579
San Pablo, CA 94806

MAR 02 1989

Dear Mr. Ohua:

Under EPA's Environmental Priorities Initiative, EPA's contractor, Ecology and Environment, Inc. is currently conducting an investigation of your facility at 225 Park Blvd., Richmond, CA. The Environmental Priorities Initiative (EPI) is an integrated RCRA/CERCLA system to identify and focus resources for clean up on the most environmentally significant sites first.

As part of this investigation, your facility is requested to provide information regarding past and current Solid Waste Management units (SWMUs). For purposes of this letter, a SWMU is defined in RCRA as any discernible waste management unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste.

You are hereby requested to provide information on SWMUs exclusive of any Part B Permit Application submittal. Please provide all information requested in Enclosures A and B which are enclosed with this letter. In addition, please have a responsible company official sign and certify your response at page 3 of Enclosure A. Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927, EPA requests that you provide this information within thirty (30) days from receipt of this letter. You should note that information regarding SWMUs must be provided for all past and current processes at your facility since operations began.

Your failure to respond fully to this information request may result in the initiation of civil enforcement proceedings against you under the authority of Section 3008 of RCRA, 42 U.S.C. Section 6928.

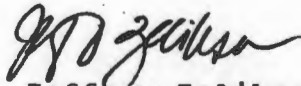
All information that you provide to EPA will be subject to public disclosure, to the extent provided by RCRA and the Freedom of Information Act, 5 U.S.C. Section 552 and EPA's Business

Confidentiality Regulations, 40 C.F.R. Part 2 (in particular, 40 C.F.R. Sections 2.202 et seq. and 2.305). To claim confidentiality you must clearly identify the information to which the claim applies. Information covered by a confidentiality claim will be disclosed by EPA only to the extent and by means of procedures set forth in 40 C.F.R. Part 2.

If no claim of confidentiality accompanies the information when it is submitted, EPA may make the information available to the public without further notice to you.

Should you have any questions pertaining to this matter, please feel free to contact Paul La Courreye or Thomas Mix of the Superfund Program Office, at (415) 974-7198 and 974-7414, respectively. Please send your response to: Environmental Protection Agency - Attn: Paul La Courreye, Site Evaluation Section (T-4-7), 215 Fremont Street, San Francisco, CA 94105.

Sincerely,



Jeffrey Zelikson
Director

Hazardous Waste Management Division

Enclosures

cc: ✓ Karen Schwinn, Chief, U.S. EPA Waste Compliance Branch
Stephen Richie, Executive Officer, Regional Water Quality
Control Board, San Francisco Bay Region
Mike James, Chief, Permitting Unit, Dept. of Health
Services, Emeryville

*order
wasting 2/14/88
FBI Law 6-
State Law.*

WARNING LETTER

CERTIFIED MAIL NO. P 454 092 069
RETURN RECEIPT REQUESTED

In Reply: T-2-4
Refer to: CAT 080 014 079
LOW

Robert J. Sisneros
Vice President
Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

Dear Mr. Sisneros:

On October 8, 1987, an investigation was conducted at Bay Area Environmental (BAE) in Richmond, California, by a representative of Jacobs Engineering Group, Inc. on behalf of the U.S. Environmental Protection Agency (EPA). A copy of the inspection report dated October 1987 is enclosed. In the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act, as amended (RCRA).

The following deficiencies were observed during the records review and facility inspection:

1. 40 CFR §265.13(a)(3)(ii) & (4)

BAE has received from off-site, shipments of hazardous wastes which the inspector determined to be misclassified by the generator or which were not adequately analyzed by the generator. BAE must inspect each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest. When the results of this inspection indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest, BAE must obtain a detailed chemical and physical analysis of a representative sample of the waste as specified in 40 CFR §265.13(a)(1) & (2). The BAE waste analysis plan indicates that additional analysis will be obtained where the initial inspection (including haz cat) shows that the waste does not match the description on the manifest. However, BAE did not implement the waste analysis plan in that BAE did not in actuality obtain the required detailed chemical and physical analysis of the incoming wastes which have been

*Has DHS permit.
Which reg (264 or
265) to cite?*

misclassified or inadequately analyzed by the generator. Some of these wastes are identified in Table 4-1 of Attachment Q-1 in the inspection report.

2. 40 CFR §262.41(a)

BAE did not prepare and submit the biennial report required of generators under 40 CFR §262.41(a).

DHS permit doesn't require

3. 40 CFR §265.73(a) and (b)(1)-(2)

The BAE operating record does not contain the following information:

- a. All method(s) and date(s) of its storage at BAE;
- b. The location of each hazardous waste within BAE and the quantity at each location; and
- c. All cross-references to specific manifest document numbers, if the waste was accompanied by a manifest.

don't have to track waste stream to off-site shipment?

4. 40 CFR §265.73(b)(9)

The operating record does not contain copies of the notices required by generators under 40 CFR §268.7(a)(1).

5. 40 CFR §268.7(a)(1) and (2)

With each off-site shipment of restricted waste, BAE did not consistently provide the treatment facility or disposal facility with the notice or notice and certification required under 40 CFR §268.7(a)(1) or (a)(2), respectively.

6. 40 CFR §268.50(a)(2)

BAE stores several drums of restricted hazardous waste which are not labeled with a specific date each period of accumulation begins.

You are hereby requested to submit a written report within thirty (30) days of receipt of this letter certifying that compliance with the above deficiencies has been achieved. Please include the following information in your report:

1. A statement that BAE will immediately implement all procedures in its waste analysis plan.
2. A copy of the revised portion of the operating record which documents that, effective within fifteen (15) days of receipt of this letter, the operating record will, for all hazardous waste handled on or after that date at BAE, include the information noted in deficiency 3 above.

3. A copy of the revised portion of the operating record which documents that, effective fifteen (15) days of receipt of this letter, a notice will be required from each generator whose restricted waste will be accepted for treatment at BAE. Documentation that the notices shall meet the requirements of 40 CFR §268.7(a) and shall be retained in BAE's operating record. Documentation of how BAE will handle a situation where a generator's restricted waste arrives without the proper notice. A set of sample notices/certifications developed by EPA Region 9 are enclosed as examples.
4. A statement that deficiency 5 has been remedied.
5. A copy of the revised portion of the operating record which documents that, effective within fifteen (15) days of receipt of this letter, a notice and, if appropriate, a certification will accompany each restricted waste which is sent off-site. Enclosed, for your guidance, is a set of sample notices/certifications that were developed by EPA Region 9.

You are hereby requested to submit within sixty (60) days of receipt of this letter the following information:

Copies of all manifests, initial inspections (including haz cat), and subsequent chemical and physical analyses for (all) off-site wastes received at BAE during a thirty (30) day period beginning fifteen (15) days from receipt of this letter.

BAE shall retain copies of these records at the facility as well as copies of similar records for all wastes received after forty-five (45) days from receipt of this letter.

Failure to achieve full compliance with the deficiencies cited in this letter within the thirty (30) day period may result in an enforcement action by EPA under Section 3008 of RCRA. You would be subject to liability for the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of non-compliance in accordance with Section 3008 of RCRA.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in 40 CFR Part 2. Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 15 1988

MEMORANDUM

SUBJECT: Region VIII Inspection of U.S. Pollution Control, Inc.,
Clive, Utah

FROM: Karen Schwinn, Chief
California Enforcement Section
RCRA Compliance Branch

TO: Lawrence Wapensky, Chief
Utah/North Dakota Section
RCRA Implementation Branch
Region VIII

I understand from discussions between you and my staff that your office will be conducting a land ban inspection at U.S. Pollution Control, Inc. (U.S. PCI) in Clive, Utah some time in February or March 1988. In performing the inspection we would appreciate your verifying information concerning two shipments of hazardous waste that were sent to U.S. PCI by Bay Area Environmental (BAE) in Richmond, California. The shipments were noted during an inspection at BAE on October 8, 1987.

The waste shipments occurred on August 26, 1987 and September 8, 1987 and were accompanied by two State of California manifests (State document numbers 87005934 and 87005954). Copies of the manifests and the narrative portion of the inspection report are enclosed.

One of the wastes is identified by a State of California waste code 711 (liquids with cyanides ≥ 1000 mg/l) and the other by California code 792 (liquids with pH ≤ 2 with metals). Because these are both restricted wastes, we would like to know if BAE submitted, with each shipment, the notice and, if appropriate, the certification required under 40 CFR §268.7(b). We suspect that BAE did not submit these documents. We are also interested to know if any waste analysis data accompanied the wastes.

Further, we would like to know if and how U.S. PCI analyzed the wastes, how U.S. PCI then handled each shipment, and what was the subsequent disposition of the wastes. We would also like to know if U.S. PCI would have immediately identified the shipments as restricted wastes based on their knowledge of the California waste codes. The waste codes are listed on the back of the receiving facility's copy of the California manifest; and a copy of the CONCURRENTS enclosed.

SYMBOL	T-2-4	T-2-4						
SURNAME	A. Katerina	K. Schwinn						
DATE	1-18-88	1-14-88						

Any additional information you might obtain that would help us to clarify the compliance status of BAE would be appreciated. Thank you for your cooperation in this enforcement effort.

If you or your inspector have any questions or require additional information, please contact April Katsura, the case development officer, at FTS 454-8137.

Attachments

bc: Lily Wong, T-2-4

2-Way Memo

Subject: Overview Investigation at Bay Area
Environmental - A State permitted Hazardous
Waste Facility.

From : Phil Bobel, Chief
Toxics and Waste Programs Branch

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (Originator of message):

Use brief, informal language.

Conserve space.

Forward original and one copy.

RECEIVER (Replier to message):

Reply below the message, keep one
copy, return one copy.

DATE OF MESSAGE

3/27/84

ROUTING SYMBOL

T-2

SIGNATURE OF ORIGINATOR

TITLE OF ORIGINATOR

Field Investigator

FOLD

INITIAL MESSAGE

Enclosed is an inspection report for Bay Area Environmental, Richmond, California. The facility was inspected as part of our State overview program.

The inspection disclosed little activity at the site. According to the operator, a local citizens group has filed a lawsuit claiming that the facility was issued a permit in violation of the local zoning laws. The operator has suspended the hiring of employees and will not actively search for new customers until settlement of the lawsuit.

The drum storage areas are well constructed and are equipped with several safety features (roof, walls, berms, sealed floors, fire walls). Safety and emergency equipment were checked and found to be in good operating condition. No violations observed.

REPLY MESSAGE

To : Daniel Shane, Field Inspections Section T-3-2
thru: Bob Mandel, Chief, Field Inspections Section
Kathleen Shimmin, Chief, Field Operations Branch

DATE OF REPLY

ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER

file
EPA ID No. CAT080014079
Report No. R(84)E082

27 MAR 1984

Bill Wahbeh, President
Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

Dear Mr. Wahbeh:

On March 6, 1984, a hazardous waste inspection was conducted at your facility. During the course of this inspection, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act of 1976. A copy of our inspection report is enclosed for your information.

If you have any questions related directly to technical aspects of this report, please contact Daniel M. Shane at (415) 974-8361. Questions related to compliance with your permit should be directed to the Berkeley office of the State Department of Health Services at (415) 540-2043.

Sincerely yours,

Kathleen G. Shislin
Chief, Field Operations Branch

Enclosure

cc: Tom Bailey, DOHS-HQ (w/o encl.)
Gil Jensen, DOHS-HQ (w/encl.)
Dwight Heenig, DOHS-Berkeley (w/encl.)

bc: Blais (T-2-1)
Wilson (T-2-2)

T-3-2#3:Shane:June:Ltr Wahbeh:3/27/84:575C

INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9

TOXICS AND WASTE MANAGEMENT DIVISION

FIELD OPERATIONS BRANCH

Purpose: Overview Investigation of State
Permitted Hazardous Waste Facility

Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

EPA ID Number: CAT080014079

Report Number: R(84)E082

Date of Inspection: March 6, 1984

EPA Inspector: Daniel M. Shane
Environmental Protection Specialist
Field Inspections Section

State Inspector: Charlene Williams
California Department of Health Services

Facility Representatives: Bill Wahbeh
President
(415) 235-9422

Report Prepared By: Daniel M. Shane

T-3-2#3:Shane:June:RPT Bay Area Env:3/26/84:575B

BACKGROUND

On August 2, 1983 DOHS granted Bay Area Environmental (BAE) a Hazardous Waste Facility Permit.

The primary objective of the inspection was to evaluate the facility's compliance with the conditions of their permit (Attachment 1).

INVESTIGATION

Process Description

BAE operates as a storage/transfer facility for hazardous waste. The facility receives waste from householders and small quantity generators, and transports it to Class I disposal facilities.

At the time of the inspection BAE was accepting small containers from households. Small containers were placed in 55-gallon drums, absorbent material was added as a filler and the drums were placed in the designated drum storage areas. Each drum is equipped with a drum packing slip (Attachment 2) that identifies the contents of the drum.

The inspection revealed little activity at the site and only one truck load of containerized waste has been transferred to a Class I disposal site since they began accepting waste on September 9, 1983.

Inventory of Waste

<u>Location</u>	<u>Quantity</u>	<u>Container Size</u>
Flammable waste storage area	5	five gallon containers
Caustic waste storage area	15	one gallon containers in 55-gallon drum
Acid waste storage area	5 1/2 drum	five gallon containers lab packs in 55-gallon drum

SUMMARY

The inspection disclosed that the facility was operating in accordance with the conditions of their permit.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 22 1981

Mr. Bill Wahbeh, P.E.
Hazardous Materials Management, Inc.
P.O. Box 2026
Castro Valley, CA 94546

RE: Bay Area Environmental Facility (EPA I.D. No. CAT080014079)

Dear Mr. Wahbeh:

We have reviewed your request for withdrawal of your permit application for the facility referenced above, submitted pursuant to Section 3005 of the Resource Conservation and Recovery Act. In accordance with your request, we are returning the documents which you submitted.

Should it be necessary for you to re-apply for a hazardous waste facility permit, you should contact us for the procedures to be followed.

Sincerely,

William D. Wilson
Hazardous Materials Branch

Enclosure

READ FILE B WILSON D 20 P 1
[A] LIST D 20 P 2 MARIE DRAFT 7-21-81

CONCURRENCES

SYMBOL	A-3-3						
SURNAME	Wilson						
DATE	7/22/81						

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM700 HEINZ AVE., BLDG. F, STE. 200
BERKELEY, CA 94710

(415) 540-3729

April 10, 1991



CERTIFIED MAIL

Mark Kasper
California Advanced Environmental
Technology Corporation
1125 Hensley Street
Richmond, CA 94801

Dear Mr. Kasper:

EPA I.D. NO. CAT 080014079, REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On February 28, 1991, the Department of Health Services (Department) conducted an inspection of California Advanced Environmental Technology Corporation (CAETC) in Richmond, California. As a result of that inspection, violations of hazardous waste statutes and regulations were found.

I. VIOLATIONS:

1. Health & Safety Code (H&SC), Section 25202(a), Title 22, California Code of Regulations (Cal. Code Regs.), Section 66374(a) and Hazardous Waste Facility Permit (HWFP), Part II(5) and Operation Plan (OP) VI.

CAETC, violated H&SC, Section 25202(a), Title 22, Cal. Code of Regs., Section 66374(a), HWFP, Part II (5) and OP VI, in that on or about February 28, 1991, CAETC packaged household hazardous waste into a one gallon DOT approved fiber container at its facility. The OP states that "All small containers and glass bottles will be packaged in 55-gallon, 17H drums".

2. Title 22, Cal. Code Regs., Section 67104(d).

CAETC violated Title 22, Cal. Code Regs., Section 67104(d), in that on or about February 28, 1991, CAETC's daily inspection logs did not include the name of the inspector.

II. SCHEDULE OF COMPLIANCE:

1. Subsequent to the inspection conducted by the Department on February 28, 1991; a departmental letter, dated March 21, 1991, clarifying the issue of handling household hazardous waste (HHHW), was sent to Advanced Environmental Technology Corporation in New Jersey. This

Report of Violation/Schedule for Compliance
California Advanced Environmental Technology Corp.
Mr. Mark Kasper
Page 2

letter stated that the consolidation of HHHW at CAETC is acceptable, as long as the consolidation is done in the designated storage areas and the household wastes consolidations are into fifty five (55) gallon, 17 H DOT approved containers.

Immediately upon receipt of this Report of Violation, CAETC must consolidate all HHHW in 55 gallon, 17 H DOT approved containers as required by their Operation Plan.

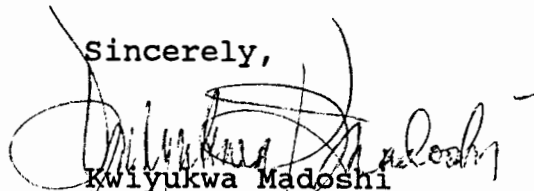
2. An inspection done by the Department on March 28, 1991, documented that CAETC has revised their daily inspection form. The new form now includes a space for the inspector's signature, instead of his initials.

Within five working days, CAETC must submit to the Department their daily inspection forms for the week of April 4 through 8, 1991 to document the use of CAETC's revised daily inspection log for the inspector's signature.

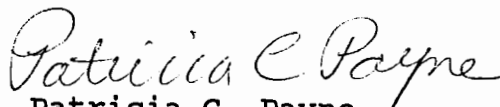
The issuance of this Report of Violations does not preclude the Department from taking administrative, civil, or criminal action as a result of the violation noted herein.

If you have any questions regarding this report, please contact Bonnie Griffith at (415) 540-3858 or Kwiyukwa Madoshi at (415) 540-3871.

Sincerely,



Kwiyukwa Madoshi
Associate Hazardous Materials
Specialist
Region 2
Toxic Substances Control Program



Patricia C. Payne
Unit Chief
Region 2
Toxic Substances Control Program

Report of Violation/Schedule for Compliance
California Advanced Environmental Technology Corp.
Mr. Mark Kasper
Page 3

cc: Ms. Lily Wong
U.S. EPA, Region IV, H41
75 Hawthorne Street
San Francisco, CA 94105

Tim Potter
Deputy Director
Contra Costa County Health Services
Occupational Health Toxics Division
4333 Pacheco Boulevard
Martinez, CA 94553

William Soo Hoo
Toxic Legal Office
Toxic Substances Control Program
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-73203

Richard Winnie
Attorney at Law
Jacobs, Spotswood, Ryken & Winnie
909 Montgomery Street, Ste. 505
San Francisco, CA 94133

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM1000 AVENUE, BLDG. F, STE. 200
RICHMOND, CA 94710

Nov. 15, 1990



Mr. J.J. Magana, Owner
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

Dear Mr. Magana:

IN RESPONSE TO A REQUEST FOR A TRANSFER OF OWNERSHIP, EPA I.D.
NO. CAT 080 014 079

The California Department of Health Services (DHS) has received your request dated October 19, 1990 for transfer of ownership of your facility at 1125 Hensley Street, Richmond, California.

Pursuant to Title 22 of the California Code of Regulations, Section 66385, and upon review of supporting financial documents, DHS approves the transfer of ownership from Bay Area Environmental, Inc. (BAE), to California Advanced Environmental Technology Corporation (CAETC).

Since BAE submitted a permit renewal application 180 days before the expiration date of their permit, CAETC will still operate under the terms and conditions established in the 1983 permit and operation plan until a new permit is issued. The 1983 permit is enclosed with a new cover sheet.

If you have any questions, please contact David Tao at (415) 540-3934.

Sincerely,

A handwritten signature in cursive script that reads 'Michael R. James'.

for Howard K. Hatayama
Regional Administrator
Region 2
Toxic Substances Control Program

cc:

Richard T. Bowles
Bowles & Verna
2121 N. California Blvd.
Walnut Creek, CA 94596

cc: (cont.)

William C. Erhardt, Vice President
Advanced Environmental Technology Corp.
Gold Mine Rd.
Flanders, New Jersey 07836

Donald Lees, Exec. V.P.
California Advanced Environmental Technology Corp.
19410 Cabot Blvd.
Hayward, CA 94545

James T. Bell, Director (w/o enclosures)
Regulatory Affairs
Advanced Environmental Technology Corp.
Gold Mine Rd.
Flanders, New Jersey 07836

Karen Scheuermann (w/o enclosures)
U.S. EPA, Region IX, (H-3-2)
75 Hawthorne St.
San Francisco, CA 94105

Kevin James (w/o enclosures)
Department of Justice
Office of Attorney General
2101 Webster St.
Oakland, CA 94612-7320

William Soo Hoo (w/o enclosures)
Toxics Legal Office
Toxic Substances Control Program
714/744 P St.
P.O. Box 942732
Sacramento, CA 94234-7320

Michael Shepard (w/o enclosures)
Toxics Legal Office
Toxic Substances Control Program
714/744 P St.
P.O. Box 942732
Sacramento, CA 94234-7320

Charlene Williams
Surveillance and Enforcement Branch
TSCP/Region 2
700 Heinz Ave., 2nd. Flr.
Berkeley, CA 94710

Mr. J.J. Magana
Bay Area Environmental, Inc.
Page 3

cc: (cont.)

Richard Winnie (w/o enclosures)
Jacobs, Spotswood, Ryken and Winnie
909 Montgomery St.
San Francisco, CA 94133

Paul Blais (w/o enclosures)
Financial Responsibility Branch
Toxic Substances Control Program
714/744 P St.
P.O. Box 942732
Sacramento, CA 94234-7320

Gabe Adebiyi (w/o enclosures)
CCCHS
Occupational Health/Toxics Div.
4333 Pacheco Blvd.
Martinez, CA 94553-2295

Rod Jones
Planning Dept., City Hall
2600 Barrett Ave.
Richmond, CA 94804

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704
(415) 540-3729



October 18, 1990

CERTIFIED MAIL

Mr. Michael Kara
General Manager
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

EPA ID #CAT080014079

Dear Mr. Kara:

**REPORT OF VIOLATION, ADDENDUM TO INVESTIGATION REPORT
DATED JULY 6, 1990**

On April 26 and May 1, 1990, the Department of Health Services (Department) conducted inspections in response to April 25, 1990 incident of a 55-gallon, stainless steel drum containing rocket fuel, which penetrated the roof of the Flammable Storage Bay and landed on the property to the southwest of the facility penetrating the roof of Bay Area Environmental, Inc. (BAE) at 1125 Hensley Street, Richmond, California 94801. As a result of review of additional information, the following violations of the hazardous waste statutes and regulations and the Hazardous Waste Facility Permit were found. The addendum to the report of the observed violations is as follows:

VIOLATIONS

1. Health and Safety Code (HSC), Section 25202, Title 22, California Code of Regulations (Cal. Code of Regs.), Section 66374 (a), and Hazardous Waste Facility Permit (HWFP), Section III 2.f.

Bay Area Environmental, Inc., violated HSC, Section 25202, Title 22, Cal. Code Regs., Section 66374 (a), and their permit, in that on or about March 30, 1990, the Facility handled and stored 12 gallons of monomethylhydrazine with aluminum, a water reactive compound, at the Facility. The HWFP expressly restricts Bay Area Environmental, Inc. from storing more than five gallons of water reactive waste at the Facility at any one time.

Mr. Michael Kara
Page 2
October 18, 1990

2. Title 22, Cal. Code of Regs., Sections 66374 (a), and Section 66570 (a), (b) and (c), 66680 (d), and HWFP, Section III 2.a.

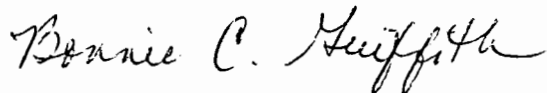
Bay Area Environmental, Inc., violated Title 22, Cal. Code Regs., Section 66374 (a) and 66570 (a), (b), and (c), 66680 (d), and their permit, in that on or about March 30, 1990, the Facility handled extremely hazardous wastes: hydrazine and monomethylhydrazine without receiving a copy of the Extremely Hazardous Waste Permit from Aerojet nor did Bay Area Environmental, Inc. have an Extremely Hazardous Waste Permit from the Department to handle these wastes.

You are hereby requested to immediately submit to the Department written and/or photographic documentation that all violations listed have been corrected. The Department may schedule a reinspection of the facility to verify compliance.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Bonnie C. Griffith at (415) 540-3858.

Sincerely,



Bonnie C. Griffith
Associate Hazardous Materials
Specialist
Surveillance and Enforcement Branch
Region 2
Toxic Substances Control Program



Patricia C. Payne
Unit Chief
Surveillance and Enforcement Branch
Region 2
Toxic Substances Control Program

Cert. Mail No. P-567 689 435

cc: See next page

Mr. Michael Kara
Page 3
October 18, 1990

cc: Ms. Lily Wong
U.S. EPA, Region IX, H41
75 Hawthorne Street
San Francisco, CA 94105

Mr. Kevin James
Department of Justice
Office of Attorney General
2101 Webster Street
Oakland, CA 94612-3049

Mr. William Soo Hoo
Toxics Legal Office
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. Michael Shepard
Toxics Legal Office
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Ms. Mary Locke
Office of Local Enforcement
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. Paul Blais
Financial Responsibility Branch
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. Larry Matz
Surveillance and Enforcement Branch
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. Gabe Adebiyi
Contra Costa County Health Services
Occupational Health/Toxics Division
4333 Pacheco Boulevard
Martinez, CA 94553-2295

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704
540-3729

October 18, 1990

**CERTIFIED MAIL**

Mr. Michael Kara
General Manager
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

EPA ID #CAT 080014079

Dear Mr. Kara:

REPORT OF VIOLATION

On August 24, August 28, and September 14, 1990 the Department of Health Services (Department) conducted inspections at Bay Area Environmental, Inc. (BAE) at 1125 Hensley Street, Richmond, California. As a result of these inspections, the following violations of the hazardous waste statutes and regulations and the Hazardous Waste Facility Permit were found. The report of the observed violations is as follows:

VIOLATIONS

1. Title 22, California Code of Regulations (Cal. Code Regs.), Sections 66508(c)(2) and 66374(a) and California Hazardous Waste Facility Permit (Permit), Section IV(2)(c)(5)(iii):

BAE violated Title 22, Cal. Code Regs., Sections 66508(c)(2) and 66374(a) and Permit, Section IV(2)(c)(5)(iii) in that on or about August 24, 1990 BAE failed to include statements which call attention to the particular hazardous properties of the waste on the drum label.

BAE stored:

- 12 55-gallon drums of oily solid hazardous waste in the caustic bay without labeling them with statements which call attention to the particular hazardous properties of the waste. The drum numbers were 452-004 thru 452-007 and 457-001 thru 457-008. The accumulation start date was August 21, 1990.
- one 55-gallon drum of pesticide waste in the pesticide bay without labeling it with statements about its hazardous properties. The drum number was 454-002.

- one 30 cubic yard hazardous waste bin lacked statements about its hazardous properties.
- One 55-gallon drum of mixed pesticides in the pesticide bay without labeling them with statements which call attention to the particular hazardous properties of the waste. The drum number was 395-006.
- One 55-gallon drum of formaldehyde waste in the pesticide bay without labeling it with statements about its hazardous properties. The drum number was 450-025.

2. Title 22, Cal. Code Regs., Section 66374(a) and Permit, Section III(12)(d):

BAE violated Title 22, Cal. Code Regs., Section 66374(a) and Permit, Section III(12)(d) in that on or about August 24, 1990 BAE failed to store hazardous waste in the appropriate bay.

BAE stored:

- Five 55-gallon drums of flammable solid paint waste in the caustic bay as opposed to the flammable bay as prescribed in the Permit. The drum numbers were 452-001, 452-008, 452-010, 452-011, and 452-012.
- Two 55-gallon drums of acidic, water-reactive acetic anhydride in the flammable bay as opposed to the caustic bay as prescribed in the Permit. The drum numbers were BAE-215-90 and 342-001.
- 12 55-gallon drums of oily solid hazardous waste in the caustic bay as opposed to the flammable bay as prescribed in the Permit. The drum numbers were 452-004 thru 452-007 and 457-001 thru 457-008.

3. Title 22, Cal. Code Regs., Sections 67106(b) and (c), 67247(a), and 66374(a); Permit, Sections II(5) and III(12)(b); Operation Plan for the Permit (OP), Section VIII, page 13; and the Partial Consent Agreement and Order (Order) No. 666811-4. Section 7(f), page 7:

BAE violated Title 22, Cal. Code Regs., Sections 67106(b) and (c), 67247(a), and 66374(a), their Permit and OP, and Order, Section 7(f), page 7 in that on or about August 24, 1990 and September 14, 1990 BAE lab-packed two water reactive chemicals into a drum with other incompatible chemicals.

On August 24, 1990, drum number 357-009 was stored in the caustic bay and that the packing slip for this drum listed 2.5 kilograms of calcium oxide and 500 grams of zinc telluride, both of which are water-reactive wastes.

On September 14, 1990, drum number BAE 176-90, located in the pesticide bay, contained various toxic compounds in addition to 500 grams of zinc telluride, a water reactive waste. The mixture of the zinc telluride with any of the other wastes would result in the generation of extreme heat and toxic gas.

4. Title 22, Cal. Code Regs., Sections 66508(a)(2) and 66374(a) and Permit, Section IV(2)(c)(5)(v):

BAE violated Title 22, Cal. Code Regs., Sections 66508(a)(2) and 66374(a) and Permit, Section IV(2)(c)(5)(v) in that on or about September 14, 1990 BAE stored drum number 476-014 in the caustic bay without an accumulation start date printed on the drum or the drums label.

5. Title 22, Cal. Code Regs., Sections 66680, 66570(a) & (d) and 66374(a) and Permit, Section III(2)(a):
BAE violated Title 22, Cal. Code Regs., Sections 66680, 66570(a), (b), & (d) and 66374(a) and Permit, Section III(2)(a) in that on or about September 14, 1990 BAE had in storage sodium peroxide, an extremely hazardous waste for which BAE had not obtained written approval from the Department before accepting.

6. Title 22, Cal. Code Regs., Section 66374(a); Permit, Section III(2)(f); and Order:

BAE violated Title 22, Cal. Code Regs., Section 66374(a); Permit, Section III(2)(f); and Partial Consent Agreement and Order, No. 666811-4 (Order) in that on or about September 14, 1990 BAE stored in excess the amount, five gallons, of water reactive hazardous waste allowed by BAE's permit.

BAE stored two 55-gallon drums of acetic anhydride (20 gallons in each drum), one 55-gallon drum of sodium peroxide (4 pounds in the drum) in the flammable bay, and one 55-gallon labpack drum of zinc telluride (500 grams) in the pesticide bay.

7. Title 22 Cal. Code Regs., Sections 67122 and 66374(a), Permit, Section III(15), and Order:
BAE violated the Permit, Title 22 Cal. Code Regs. Sections 67122 and 66374(a), and the Order in that on or about August 30, 1990 BAE failed to maintain fire

Mr. Michael Kara
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equipment as necessary to assure its proper operation in time of emergency.

A fire extinguisher, located in the caustic bay, was observed on August 30, 1990, in need of recharge. The gauge on the fire extinguisher indicated that it needed to be recharged. The fire extinguisher was missing an inspection and recharge date tag.

You are hereby requested to immediately correct all violations cited and submit to the Department documentation that the corrections have been made. The Department may schedule a reinspection of the BAE, Richmond facility to verify compliance.

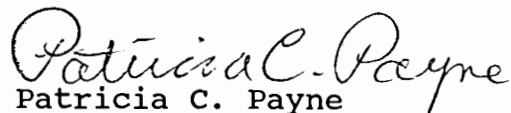
The issuance of this Report of Violations does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Michael Pixton at (415) 540-3862.

Sincerely,



Michael Pixton
Hazardous Materials Specialist
Surveillance and Enforcement
Branch
Region 2
Toxic Substances Control Program



Patricia C. Payne
Senior Hazardous Materials
Specialist
Surveillance and Enforcement
Branch
Region 2
Toxic Substances Control Program

Cert. Mail No.: P-106 353 392

cc: See next page.

Mr. Michael Kara
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DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704



September 11, 1990

CERTIFIED MAIL

Mr. Michael Kara
General Manager
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

EPA ID #CAT 080014079

Dear Mr. Kara:

REPORT OF VIOLATION

On July 13, July 20, July 26, and August 6, 1990, The Department of Health Services conducted inspections at Bay Area Environmental, Inc. (BAE) at 1125 Hensley Street, Richmond, California. As a result of these inspections, the following violations of the hazardous waste statutes and regulations and the Hazardous Waste Facility Permit were found. The report of the observed violations is as follows:

VIOLATIONS

1. California Health and Safety Code, Division 20, Section 25189 (a):

BAE violated California Health and Safety Code, Division 20, Section 25189 (a) in that on or about August 2, 1990, BAE intentionally or negligently made a false statement on an inspection record. The Daily Inspection Report for August 2, 1990 falsely states that the shower/eyewash was functional and not leaking.

2. Title 22, California Code of Regulations (Cal. Code Regs.), Sections 66374 (a) and 67122, and Hazardous Waste Facility Permit (Permit) Section III (10)(c):

BAE violated Title 22, Cal. Code Regs., Sections 66374 (a) and 67122, and their Permit in that on or about August 2, 1990, BAE did not remedy any deterioration or malfunction of equipment which inspection revealed. The shower/eyewash near the caustics bay was malfunctioning during the inspection on August 2, 1990.

This is a repeat violation from the inspections conducted on June 7-8, 1990.

3. Title 22, Cal. Code Regs., Section 66374 (a), 67106 (b) and (c) and 67247 (a), and Permit Sections II (5) and III (12) (b), and Operation Plan Section VIII (pg. 13) and Partial Consent Agreement and Order Re: Preliminary Injunctive Relief (Order), No. 666811-4, filed July 17, 1990, Section 7(f).

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), 67106 (b) and (c) and 67247 (a), and their Permit and the Order in that they stored incompatible wastes together in the same container without provisions to prevent the generation of extreme heat, toxic or flammable gases, damage the structural integrity of the container, or otherwise threaten human health or the environment. The following are specific instances of wastes stored together that are incompatible according to A Method for Determining Hazardous Wastes Compatibility by H. K. Hatayama et. al.:

(1) On or about July 13, 1990, BAE lab packed a flammable liquid with corrosives, water reactives, and an oxidizer, which are incompatible when mixed together. Drum number BAE-218-90 contained nine gallons of o-chlorotoluene (flammable), one pound of bromine (a strong oxidizer), and various corrosive and/or water reactive waste chemicals including one pound of phosphorus pentoxide, one pound of boron tribromide, one pound of aluminum chloride, 100 grams of antimony trichloride, and ten liters of thionyl chloride. These wastes are incompatible and if mixed would result in a fire and/or toxic gas release.

(2) On or about July 20, 1990, BAE lab packed acetic anhydride, a water reactive waste, with diethyl pyrocarbonate, a flammable waste in drum number BAE-215-90; and lab packed calcium carbide, sodium metal, and lithium metal, which are water-reactive materials, with other hazardous waste groups in drum number BAE-222-90.

(3) On or about July 26, 1990, BAE lab packed malathion (one pound) with aluminum metal (one pound) which can produce extreme heat on mixing; lab packed diazinon (0.75 pounds) and sodium carbonate (10 pounds), which can produce extreme heat and fire on mixing; lab packed sodium carbonate (10 pounds) and aluminum metal (one pound) which can produce extreme heat and generate flammable gas on mixing; and lab packed sodium cyanide (0.5 gallons)/potassium cyanide (two pounds) and aluminum metal (one pound) which can produce extreme heat and generate flammable gas on mixing.

(4) On or about August 6, 1990, BAE lab packed calcium oxide with other hazardous waste groups, which can produce extreme heat on mixing.

4. Title 22, Cal. Code Regs., Section 66508 (a) (2-3) and (c):

BAE violated Title 22, Cal. Code Regs., Section 66508 (a) (2-3) and (c) on that on or about July 26 to August 2, 1990, BAE failed to label its two 30 cubic yard hazardous waste storage bins with the words "Hazardous Waste", the accumulation start date, the composition and physical state of the waste, statements which call attention to the particular hazardous properties of the waste, and the name and address of the person producing the waste.

5. Title 22, Cal. Code Regs., Section 66508 (a) (2):

BAE violated Title 22, Cal. Code Regs., Section 66508 (a) (2) in that :

(1) on or about July 13, 1990, BAE stored a 55-gallon drum of hazardous corrosive waste in the acid bay without an accumulation start date written on the label;

(2) on or about July 20, 1990, BAE stored a 55-gallon drum of hazardous corrosive waste (drum number BAE-265-90) in the caustic bay without an accumulation start date written on the label. Mr Etheredge marked an accumulation start date on the drum's label during this inspection.

6. Title 22, Cal. Code Regs., Section 66508 (c) (2), and Permit, Section IV (2) (c) (5) (iii):

BAE violated Title 22, Cal. Code Regs., Section 66508 (c) (2), and their Permit in that on or about July 20 to July 26, 1990, BAE did not label 55-gallon drum number BAE-178-90 with statements which call attention to the particular hazardous properties of the wastes in the drum. This drum contained radioactive hazardous waste.

7. Title 22, Cal. Code Regs., Section 66374 (a) and 67243 (a), and Permit Section IV (2) (c) (2):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a) and 67243 (a), and their Permit in that on or about July 13 and on or about August 2, 1990, BAE stored hazardous waste in an open container when no waste was being added to or removed from the bin. The waste was stored in the 30 cubic yard bin.

On August 2, 1990, Mr. Kara made the statement that the bins were opened at 8:00 a.m., left open all day, and closed at 5:00 p.m. as a normal operating practice.

8. Title 22, Cal. Code Regs., Sections 66374 (a) and 67124, and Permit Section III (16).

BAE violated Title 22, Cal. Code Regs., Sections and 66374 (a) and 67124, and their Permit in that on or about July 26 to August 6, 1990, BAE did not provide sufficient aisle space between its waste oxidizer drums and empty drums in the maintenance shop (transit bay).

9. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Section II (5), and Operation Plan for the Permit, Section VIII, page 13:

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that on or about August 6, 1990, BAE stored a hazardous waste in a non-permitted area. Uranium nitrate, a hazardous radioactive waste, was stored in the office of Michael Kara on August 6, 1990.

10. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Sections II(1) and IV (2) (c) (1):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that on or about July 13, 1990, BAE stored hazardous waste in its maintenance shop (transit bay), a non-permitted storage area for hazardous waste.

This is a repeat violation from inspections conducted on April 25, 1990, June 7-8, 1990, and June 19, 1990.

11. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Section II (5), and Operating Plan Sections VI (page 6) and VIII (page 13):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that on or about July 13 to August 2, 1990, BAE lab packed hazardous waste into a container other than a 17H drum as specified in its Operation Plan. Hazardous waste drums made of polyethylene were observed as containers for lab packs in the acid, pesticide, caustic, and oxidizer bays.

This is a repeat violation from inspections conducted June 7-8, 1990 and June 19, 1990.

12. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Section III (2) (f), and the Order:

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit and the Order in that on or about July 20, 1990, BAE stored over five gallons of water reactive waste. BAE stored 22 gallons of acetic anhydride, 27-29 pounds of calcium carbide, one pound of sodium metal, and one gram of lithium metal, all of which are water reactive according to A Method for Determining Hazardous Wastes Compatibility by H. K. Hatayama et. al.

This is a repeat violation from an inspection conducted June 19, 1990.

13. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Sections II (5), III (12) (d), and IV (2) (c) (1) and (g), and Operation Plan Section VIII (page 13):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that:

(1) on or about July 13 to July 20, 1990, BAE stored two 55-gallon drums of cyanide waste in the pesticide bay as opposed to the caustic bay as specified in the Permit.

(2) on or about July 20, 1990, BAE stored a flammable hazardous waste, diethyl pyrocarbonate, in the acid bay.

(3) on or about July 26, 1990, BAE stored incompatible waste groups in the same drum and same storage bay. Drum number BAE-239-90, stored in the pesticide bay, contained flammable nitrocellulose which should be stored in the flammable bay, and 20 containers of cyanides which should be stored in the caustic bay according to BAE's Permit. Also, BAE stored 28 drums of ORM-E wastes in the caustic bay instead of in the pesticide bay.

14. Title 22, Cal. Code Regs., Section 66374 (a), and Permit. Section IV (2) (a) (2):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that on or about July 20, 1990, BAE failed to transfer the hazardous waste from a 55-gallon polyethylene drum holding hazardous waste not in good condition to a container that is in good condition. Drum number BAE-130-90 was dented.

Mr. Kara said that when opened, the drum returned to its original shape.

15. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Section III (2) (e):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that on or about July 13, 1990, BAE exceeded the drum storage capacity of its caustic bay. On July 13, 1990, the caustics bay held 107 drums but was only permitted to hold 105 drums.

16. Title 22, Cal. Code Regs., Sections 66374 (a), 66680, and 66570 (a) (b) (d), and Permit Section III (2) (a):

BAE violated Title 22, Cal. Code Regs., Sections 66374 (a), 66680, and 66570 (a) (b) (d), and their Permit in that:

(1) on or about July 13, 1990, BAE accepted and stored extremely hazardous wastes without prior authorization from the Department in the form of Extremely Hazardous Waste Permits. BAE accepted and lab-packed two extremely hazardous wastes: drum number BAE-218-90 contained thionyl chloride and bromine.

(2) on or about July 26, 1990, BAE accepted and stored six extremely hazardous wastes without prior authorization from the Department in the form of Extremely Hazardous Waste Permits. Drum number BAE-239-90 contained selenium, vanadium pentoxide, sodium arsenate, and beryllium chloride. Drum number 320-003 contained acetyl chloride and benzoyl chloride.

(3) on or about August 2, 1990, BAE accepted and stored an extremely hazardous waste, chlordane, without prior authorization from the Department in the form of Extremely Hazardous Waste Permits.

This is a repeat violation from an inspection conducted June 19, 1990.

17. Partial Consent Agreement and Order Re: Preliminary Injunctive Relief (Order), No. 666811-4, filed July 17, 1990, page 5, lines 20-21:

BAE violated the Order in that on or about August 2, 1990 and August 6, 1990, BAE handled hazardous oxidizer waste in the maintenance shop (transit bay). BAE employees were observed working with small containers of oxidizer wastes on August 2, 1990 and August 6, 1990 in the maintenance shop, while the Order specifies only that oxidizer wastes may be stored there.

18. Partial Consent Agreement and Order Re: Preliminary Injunctive Relief (Order), No. 666811-4, filed July 17, 1990, page 9, lines 11-15:

BAE violated the Order in that on or about July 31, 1990, BAE incorrectly filled out the standardized check-sheet. The check-sheet for July 31, 1990 does not indicate that drum number 398-018 contained a water-reactive waste.

19. Title 22, Cal. Code Regs., Section 66374 (a), Permit Section II (5), and Operation Plan Section VII (A) (page 8):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a) and their Permit in that on or about August 2, 1990, BAE failed to provide its employees with adequate personal protective equipment such as hard hat, rubber suit, gloves, face shield/goggles and boots while handling hazardous waste.

20. Title 22, Cal. Code Regs., Section 66374 (a), and Permit Section II (5), and Operating Plan Section VIII (page 14):

BAE violated Title 22, Cal. Code Regs., Section 66374 (a), and their Permit in that on or about July 13, 1990, they did not follow the specifications of their Operation Plan. They did not use A Method for Determining Hazardous Wastes Compatibility by H. K. Hatayama et. al. as a guide for packaging potential incompatible wastes.

This violation was repeated on or about July 20, 1990, July 26, 1990, and August 6, 1990.

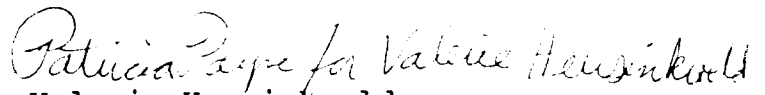
BAE should return to compliance immediately.

The issuance of this Report Of Violations does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted herein.

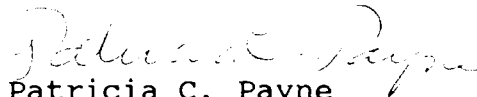
Mr. Michael Kara
Bay Area Environmental, Inc.
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If you have any questions regarding this report, please contact
Valerie Heusinkveld at (415) 540-3901.

Sincerely,



Valerie Heusinkveld
Hazardous Materials Specialist
Surveillance and Enforcement
Branch
Region 2
Toxic Substances Control Program



Patricia C. Payne
Senior Hazardous Materials
Specialist
Surveillance and Enforcement
Branch
Region 2
Toxic Substances Control Program

Cert. Mail No.: P106353478

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Martinez, CA 94553-2295

Mr. Michael Kara
Bay Area Environmental, Inc.
Page 9

bcc: Marvel Flentoil - Surveillance and Enforcement, Region 2
Patricia Payne - Surveillance and Enforcement, Region 2
Patti Barni - Surveillance and Enforcement, Region 2
Sal Ciriello - Facility Permitting Branch, Region 2

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DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704

(415) 540-3729

August 16, 1990



CERTIFIED MAIL

Mr. Michael Kara
General Manager
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

EPA ID #CAT 080014079

Dear Mr. Kara:

REPORT OF VIOLATION

On April 26 and May 1, 1990, the Department of Health Services (Department) conducted inspections in response to April 25, 1990 incident of a 55-gallon, stainless steel drum containing rocket fuel, which penetrated the roof of the Flammable Storage Bay and landed on the property to the southwest of the facility penetrating the roof of Bay Area Environmental, Inc. (BAE) at 1125 Hensley Street, Richmond, California 94801. On June 7 and 8, 1990 the Department conducted a regular inspection of the Facility, which was followed by an inspection on June 19, 1990 in response to another incident which occurred at BAE on June 18, 1990. As a result of these inspections, the following violations of the hazardous waste statutes and regulations and the Hazardous Waste Facility Permit were found. The report of the observed violations is as follows:

VIOLATIONS

APRIL 26 AND MAY 1, 1990:

1. Title 22, California Code Regulations (Cal. Code Regs.), Sections 66374 (a) and 67102 (a) and Hazardous Waste Facility Permit (HWFP), Section III. (8)(b).

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Sections 66374 (a) and 67102 (a) and their permit, in that on or about March 30, 1990, the Facility did not obtain a detailed chemical and physical analysis of a representative sample of the material.

Mr. Michael Kara
Page 2
August 16, 1990

2. Title 22, Cal. Code Regs., Sections 66374 (a) and 67162 (b) and HWFP, Section III. 19(b).

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Sections 66374 (a) and 67162 (b) and their permit in that on or about April 13, 1990, Bay Area Environmental, Inc., upon discovering a significant discrepancy did not submit to the Department of Health Services a letter describing the discrepancy and attempts to reconcile it within 15 days after receiving the waste.

3. Title 22, Cal. Code Regs., Section 66374 (a) and HWFP, Section IV. 2(c)(1)(3).

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs, Section 66374 (a) and their permit in that on or about April 26, 1990, the Facility stored hazardous waste, drum number BAE 117-007, which contained water, acetone and petroleum distillates, and other drums in the Maintenance Shop. This area is not designated in the approved operation plan for storing hazardous waste.

4. Title 22, Cal. Code Regs., Sections 66374 (a) and 66570 (a), (b), and (d) and HWFP, Section III. 2.a.

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Sections 66374 (a) and 66570 (a), (b), and (d) and their permit in that on or about March 29, 1990, the Facility handled an extremely hazardous waste, methyl hydrazine, without written authorization from the Department of Health Services.

JUNE 7 AND 8, 1990:

1. Title 22, Cal. Code Regs., Section 66374 (a) and HWFP, Sections IV. 2(c)(1)(3) and II.1.

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs, Section 66374 (a) and their permit, in that on or about June 7 and 8, 1990, the Facility stored hazardous waste in the Maintenance Shop. This area is not designated in the approved operation plan for storing hazardous waste.

This is a repeat violation from an inspection conducted on April 25, 1990 at BAE.

2. Title 22, Cal. Code Regs., Sections 66374 (a) and 67122 and HWFP, Section III. 14.(a).

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs. Sections 66374 (a) and 67122 and their permit in that on or about June 7 and 8, 1990 the Facility did not maintain decontamination equipment. While the regular eyewashes and safety showers at the Facility had been inoperable due the April 25, 1990 explosion, Bay Area Environmental, Inc. had not brought in portable eyewashes and safety showers, pending repair of the damaged equipment.

3. Title 22, Cal. Code Regs., Section 66374 (a) and HWFP, Section II. 5. and Operation Plan, Sections VI. and VIII.

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Section 66374 (a) and their permit in that on or about June 7 or 8, 1990 they used fiber packs as lab packs and on March 5, 1990 they used a 17-E polyethylene drum. Although the wastes are compatible with these containers, BAE's Operation Plan specifies that all small containers and glass bottles shall be packaged in 55-gallon 17 H drums.

JUNE 19, 1990:

1. Title 22, Cal. Code Regs., Sections 67120 and 66374 (a), and HWFP, Section III.3.a.

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Sections 67120 and 66374 (a), and their permit, in that on or about June 18, 1990, the Facility by improperly consolidating hazardous waste, thionyl chloride, failed to take adequate precautions to minimize the risk of a release of hazardous waste to the environment at the Facility. An acid cloud release occurred on June 18, 1990 as a result of consolidating water reactive wastes.

2. Title 22, Cal. Code Regs., Sections 67106 (b) and (c), 66374 (a), and 67247 (a) and HWFP, Section III 12.b.

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Sections 67106 (b) and (c), 66374 (a), and 67247 (a), and their permit, in that on or about June 18, 1990, the Facility failed to take adequate precautions to prevent a violent reaction; a reaction which produced uncontrolled toxic mists, fumes, dusts, or gases; and which threatened human health or the environment. BAE mixed thionyl

chloride, a water reactive waste, with a mixture of methanol, chloroform, thionyl chloride, and ether which resulted in the release of an acid cloud.

3. Title 22, Cal. Code Regs., Sections 66570 (a),(b), and (d) and 66374 (a), and HWFP, Section III. 2.a.

Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Sections 66570 (a),(b), and (d) and 66374 (a), and their permit, in that on or about June 18, 1990, the Facility handled an extremely hazardous waste, thionyl chloride, without written authorization from the Department of Health Services.

4. Title 22, Cal. Code Regs., Section 66374 (a), and HWFP, Section III. 2.f.

Bay Area Environmental, Inc. violated Title 22, Section 66374 (a), and their permit, in that on or about June 18, 1990, the Facility stored at least eight gallons of thionyl chloride, a water reactive waste, at the Facility. The permit expressly restricts BAE to storing no more than five gallons of water-reactive waste at the Facility at any one time.

5. Title 22, Cal. Code Regs., Section 66374 (a), and HWFP, Section III. 8.b.

Bay Area Environmental, Inc. violated Section 66374 (a), and their permit, in that on or about June 18, 1990, the Facility had no detailed physical and chemical analysis of a representative sample of the 20 five gallon containers and one three-gallon pail of waste methanol, chloroform, ether, and thionyl chloride and the 12 2.5-liter containers of thionyl chloride. BAE stored these hazardous wastes at the Facility, and consolidated them into two drums.

6. Title 22, Cal. Code Regs., Section 66374 (a) and HWFP Sections II.5. and IV. 2. c.

Bay Area Environmental, Inc. Title 22, Cal. Code Regs., Section 66374 (a) and their permit, in that on or about June 19, 1990, the Facility stored containers holding hazardous waste in the maintenance shop, an area not designated in the Facility's approved operation plan.

Mr. Michael Kara
Page 5
August 16, 1990

This is a repeat violation observed during a Department inspection conducted on June 7 and 8, 1990.

7. Title 22, Cal. Code Regs., Section 66374 (a) and HWFP, Section II. 5 and Operation Plan, Section VI.

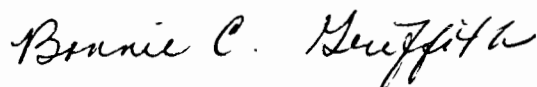
Bay Area Environmental, Inc. violated Title 22, Cal. Code Regs., Section 66374 (a) and their permit in that on or about, June 18, 1990 the Facility used polyethylene drums to combine a mixture of methanol, chloroform, thionyl chloride, and ether with thionyl chloride. The polyethylene drums are compatible with these chemicals. However, the Facility's Operation Plan specifies that all small containers and glass bottles will be packaged in 55-gallon 17H drums. The Facility can only consolidate materials that can be packaged into 55-gallon 17 H drums as specified in the Operation Plan.

This is a repeat violation observed during a Department Inspection conducted on June 7 and 8, 1990.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Bonnie C. Griffith at (415) 540-3858.

Sincerely,



Bonnie C. Griffith
Associate Hazardous Materials
Specialist
Surveillance and Enforcement Unit
Region 2
Toxic Substances Control Program



Patricia C. Payne
Senior Hazardous Materials
Specialist
Surveillance and Enforcement Unit
Region 2
Toxic Substances Control Program

Mr. Michael Kara
Page 6
August 16, 1990

Cert. Mail No. P-106 353 132

cc: Ms. Lily Wong
U.S. EPA, Region IX, H41
1235 Mission Street
San Francisco, CA 94103

Mr. Kevin James
Deputy Attorney General
Department of Justice
2101 Webster Street
Oakland, CA 94612-3049

Mr. Gabe Abebiyi
Contra Costa County Health Services
Occupational Health/Toxics Division
4333 Pacheco Boulevard
Martinez, CA 94553-2295

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



May 11, 1990

CERTIFIED MAIL

Mr. Jesus Magana
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

EPA I.D. NO. CAT 080014079

Dear Mr. Magana:

TENTATIVE DECISION TO REVOKE OPERATING PERMIT

The California Department of Health Services proposes to revoke the Hazardous Waste Facility Permit, No. CAT 080014079, issued to you on August 2, 1983. This decision was based on failure of the facility to operate in compliance with the Hazardous Waste Control Act, applicable regulations and permit requirements.

A public notice is being issued which schedules a public comment period and a public hearing on this decision.

If you believe that the tentative decision to revoke this permit is inappropriate, it is your responsibility to raise all ascertainable issues and submit all available arguments and facts supporting your position by the end of the public comment period.

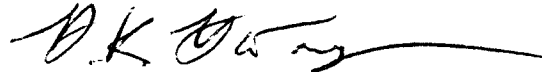
Enclosed for your information is a copy of the Notice of Intent to Revoke a Permit and the Statement of Basis prepared for this decision.

This letter will also serve to confirm that you rescinded your January 12, 1989, permit renewal and modification application by your letter dated March 30, 1990.

Bay Area Environmental
May 11, 1990
Page 2

If you have any questions regarding this letter, please contact Patricia Payne of this office at (415) 540-3729.

Sincerely,



Howard Hatayama
Regional Administrator
Region 2
Toxic Substances Control Program

Enclosure(s)

Cert. Mail No. P 106 353 215

cc: Richard T. Bowles, Esq.
Bowles & Verna
2121 N. California Blvd.
Suite 875
Walnut Creek, CA 94596

Kevin James
Deputy Attorney General
Department of Justice
2101 Webster Street
Oakland, CA 94612-3049

C. David Willis
Deputy Director
Department of Health Services
Toxic Substances Control Program
714/744 P Street
Sacramento, CA 94234-7320

Mike Shepard
Staff Attorney
Department of Health Services
Toxic Substances Control Program
Toxics Legal Office
714/744 P Street
Sacramento, CA 94234-7320

Bay Area Environmental
May 11, 1990
Page 3

William Walker, M.D.
Health Officer
Contra Costa County Health Services
20 Allen Street
Martinez, CA 94553

#-4-1

Lily Wong
U.S. EPA, Region IX, H41
1235 Mission Street
San Francisco, CA 94103

#-4-1

Jim Brietlow
U.S. EPA, Region IX, H-3-2
1235 Mission Street
San Francisco, CA 94103

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



Department of Health Services

STATEMENT OF BASIS

Intent To Revoke A Permit

Activity

Hazardous waste transfer station and storage facility.

Facility Name

Bay Area Environmental, Inc.

EPA Identification Number

CAT 080014079

Facility Location

1125 Hensley Street
Richmond, California 94801
(Contra Costa County)

Facility Owner/Operator

Owner:

J.J. Magana Corporation

Operator:

Bay Area Environmental, Inc.

Public Comment Period

Begins: May 15, 1990

End: June 29, 1990

All persons, including the owner/operator, who believe that the tentative decision to revoke this permit to operate is inappropriate must raise all ascertainable issues and submit in writing all available arguments and facts supporting their position by June 29, 1990. Two copies of such comments should be sent to:

Department of Health Services
Toxic Substances Control Program
Attn: Stan Giorgi
2151 Berkeley Way, Annex 9
Berkeley, California 94704
(415) 540-3920

Public Hearing

Department of Health Services (Department) will hold a public hearing on Thursday, June 14, 1990 at Peres Elementary School Auditorium, located at 719 5th Street in Richmond, California. Any person may provide written comments or oral statements and data pertaining to this proposed revocation of a permit at the public hearing.

Description of Hazardous Waste Activity at the Facility

The facility is located on a site of approximately one acre in an industrial area of northwestern Richmond. It has been a transfer station since 1983. There are two structures on the site: a building containing the offices, laboratories, and shop, to which is attached an open fronted shed which contains the flammable and the oxidizer storage bays; and a separate open fronted shed which contains the acids, oil and pesticides, and caustics storage bays.

Bay Area Environmental, Inc. receives wastes from residences and industry, repackages the wastes into drums or tank trucks as necessary, and stores the wastes in drums in order to consolidate them into full truck loads for disposal or recycling.

Bay Area Environmental, Inc. does not have any industrial processes that generate waste, except motor vehicle maintenance. As a transfer station, the facility acts as a generator for the wastes it has received and stored when the wastes are sent for disposal or recycling.

Rationale for Revocation of Permit to Operate

Bay Area Environmental, Inc. is currently operating under an extension of its revised Part B Permit, granted by the Department on October 31, 1988.

The Department, based on Bay Area Environmental's record of non-compliance with, and repeated violations of hazardous waste statutes and regulations and its permit, proposes to revoke the facility's Hazardous Waste Facility Permit.

Between 1987 and 1990, the Department conducted several facility inspections that identified numerous violations listed in the Reports of Violations which are included in the Administrative Record. Among the more serious violations found are the following:

- o Storing incompatible wastes and failing to take adequate precautions to prevent a reaction which generated extreme

pressure, produced an uncontrolled toxic mist or gas, damaged the structural integrity of the device in which the incompatible wastes were stored, and otherwise threatened human health and the environment.

- o Failing to store hazardous waste at the facility in a manner which minimized the possibility of unplanned sudden or non-sudden release of that waste.
- o Storing hazardous waste outside the area designated in the facility's Operational Plan, and not within an impervious containment system or upon an impervious base.
- o Storing reactive wastes at the facility without taking adequate precautions to prevent reactions which produce uncontrolled toxic mists or gases, and failing to take precautions to prevent the accidental reaction of reactive wastes, and failing to separate such wastes and to protect them from sources of reaction.
- o Storing more containers of hazardous waste in storage bays at the facility than were authorized by the Permit.

For the above reasons, the Department proposes to revoke Bay Area Environmental's Hazardous Waste Facility Permit.

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



PUBLIC NOTICE
Of Public Comment Period and Public Hearing
on the Intent to Revoke a Permit to Operate a Facility at
Bay Area Environmental, Inc.

The California Department of Health Services (Department) requests public comment upon a proposed PERMIT REVOCATION for operation of a hazardous waste facility by BAY AREA ENVIRONMENTAL, INC.

This facility is currently operating under a permit. This PERMIT REVOCATION would terminate permission to handle hazardous waste in accordance with the rules and regulations adopted pursuant to the California Health and Safety Code, Section 25186, and Title 22 of the California Code of Regulations, Division 4, Chapter 30. This facility is located at 1125 Hensley Street, Richmond, California, in Contra Costa County. The basis for this tentative decision is the failure of the facility to operate in compliance with the Hazardous Waste Control Act, applicable regulations, and permit requirements.

If this proposed PERMIT REVOCATION is made final, and there is no appeal, handling of hazardous waste at the facility must cease, and procedures for closing will commence.

Oral and written comments regarding this decision will be accepted at a public hearing on the date listed below. By participating in this hearing, you ensure that your concerns are communicated to the Department. The hearing will take place at:

Peres Elementary School Auditorium
719 5th Street
Richmond, California
Thursday, June 14, 1990, 7:30 p.m.

Written comments will also be accepted until June 29, 1990, at the Department's address listed below. The ADMINISTRATIVE RECORD for the proposed PERMIT REVOCATION, which includes the Statement of Basis explaining the reasons for the tentative decision, is available for public review and inspection. The ADMINISTRATIVE RECORD may be viewed Monday through Friday from 9:00 a.m. until 4:00 p.m. at the Department's address below. The ADMINISTRATIVE RECORD is also available at the Richmond Public Library. Please call the library for its hours of operation.

Department of Health Services
Toxic Substance Control Program
700 Heinz Ave., Bldg. F, 2nd Floor
Berkeley, California 94710

Richmond Public Library
325 Civic Center Plaza
Richmond, California 94804
415-620-6559.

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



January 30, 1990

CERTIFIED MAIL

Mr. J. Jesus Magana
Bay Area Environmental
1125 Hensley
Richmond, Ca. 95020

Dear Mr. Magana:

REPORT OF VIOLATION; EPA ID# CAT080014079

On December 20, 1989, the Department of Health Services (DHS) conducted an inspection of Bay Area Environmental (BAE) in Richmond, California. As a result of that inspection, violations of hazardous waste statutes and regulations were found.

VIOLATIONS

1. Title 22, California Code of Regulations (CCR), Sections 67247(c) and 66374(a); Hazardous Waste Facility Permit (HWFP), Section IV, 2.g.:

BAE violated Title 22, CCR, Sections 67247(c) and 66374(a); HWFP, Section IV, 2.g. in that on or about December 20, 1989 BAE stored incompatible hazardous wastes in the same storage bay without separating them by berm.

- a. On December 20, 1989 I observed four 55-gallon steel drums in the caustics storage bay which were labeled as containing chromic acid (photos 1 and 3). These drums arrived at BAE on December 18, 1989 under manifest #88515204. Among the 70 drums stored in the caustics storage bay on this day were seven 55-gallon drums which contained waste sodium cyanide (NaCN), pH = 13-14. Eight other 55-gallon drums in the caustics storage bay on this day contained dry cell caustic batteries.
- b. On December 20, 1989 I observed twenty-one 55-gallon steel drums in the oxidizer storage bay which were labeled as containing hydrocarbon contaminated soil (photo #2). Among the 63 drums located in the oxidizer storage bay on this day was a drum which contained waste hydrogen peroxide, a strong oxidizing agent. Two other drums in the oxidizer storage bay contained waste sodium hypochlorite, also a strong oxidizing agent.

The hazardous waste incompatibility chart describes the potential consequences of mixing the above listed hazardous wastes (attachment 2). This is a repeat violation, having been observed during the May 11, 1988 and August 12, 1987 DHS inspections of BAE.

2. Title 22, CCR, Section 67106(a) & (b)(2):

BAE violated Title 22, CCR, Section 67106(a) & (b)(2) in that on or about December 20, 1989 BAE stored reactive wastes without taking precautions to prevent reactions which could produce uncontrolled toxic mists or gases.

On December 20, 1989 BAE stored seven 55-gallon drums containing a caustic cyanide solution within 20 feet of four 55-gallon drums containing chromic acid, all located in the caustics storage bay. When in contact, chromic acid and cyanide can react to form toxic hydrogen cyanide gas (attachment 2).

This is a repeat violation, having been cited in the June 29, 1988 Report of Violation issued to BAE by the Department.

3. Title 22, CCR, Section 67242:

BAE violated Title 22, CCR, Section 67242 in that on or about December 20, 1989 BAE was storing hazardous waste in containers which were not compatible with the waste stored therein.

On December 20, 1989 I observed four 55-gallon steel drums which were used to store corrosive chromic acid. John Yap said that the acids and caustics were stored in steel drums with poly liners. I asked John how he identified the drums with poly liners, and he showed me drums which had poly necks and bungs. The four steel drums used to store chromic acid had no poly necks or bungs and two drums (photos 1,3) showed evidence of corrosion.

4. Title 22, CCR, Section 66374(a) and HWFP, Section III, 2.e.:

BAE violated Title 22, CCR, Section 66374(a) and HWFP, Section III, 2.e. in that on or about December 20, 1989 BAE was storing hazardous waste which is prohibited from being handled or stored at their facility.

On December 20, 1989 I observed a 55-gallon steel drum in the oxidizer storage bay which was labeled as containing light ballasts. John Yap said that this waste is managed under the assumption that the ballasts contain PCB oil.

This is a repeat violation, having been observed during the May 11, 1988 DHS inspection of BAE.

5. Title 22, CCR, Sections 66508(a)(2)(3) & (c) and 66374(a); HWFP, Section IV, 2.c(5):

BAE violated Title 22, CCR, Section 66374(a) and HWFP, Section IV, 2.c(5) in that on or about December 20, 1989 BAE was storing hazardous waste in containers which were either unlabeled or incompletely labeled.

- a. On December 20, 1989 I observed four 55-gallon steel drums (numbers 9L-5941 through 9L-5944) in the caustics storage bay which had labels that lacked a statement calling attention to the particular hazardous properties of the waste. The labels on these drums stated that the contents were "hazardous waste solid-California regulated waste only".
- b. On December 20, 1989 I observed four 55-gallon steel drums in the pesticides storage bay which had labels describing the contents as "body parts". No statement was made to call attention to the hazardous properties of the waste. I asked Ben Cruz what constituted the hazardous portion of this waste and he told me it was formaldehyde.
- c. On December 20, 1989 I observed two 55-gallon steel drums in the flammables storage bay which had no label (photos 4,5).

This is a repeat violation, having been observed during the May 11, 1988 DHS inspection of BAE.

6. Title 22, CCR, Section 67104(b)(4) & (d):

BAE violated Title 22, CCR, Section 67104(b)(4) & (d) in that on or about December 20, 1989 BAE failed to conduct inspections daily and the schedule did not include the date and nature of repairs and remedial actions taken at the facility (attachment 3).

On December 20, 1989 I reviewed BAE's inspection records and discovered the following:

(b)(4)- no inspections were conducted on October 11, 16, 19 & 23, 1989. An inspection log was included in the records, however nothing other than the name Ben and the date appeared on these sheets.

(d)- repairs are not noted in the inspection log. The November 14, 1989 inspection log showed problems with the eye wash/safety shower and loading/unloading area, and a lack of signs. The November 15, 1989 inspection log, and all subsequent logs, make no mention of these problems or any repairs.

This is a repeat violation, having been cited in the June 29, 1988 Report of Violation issued to BAE by the Department.

7. Title 22, CCR, Section 67102(a):

BAE violated Title 22, CCR, Section 67102(a) in that BAE's waste analysis did not contain all the information which must be known to properly store the waste.

On December 20, 1989 I observed manifest number 87041974 and the associated disposal facility waste profile sheets (attachment 4). On Northwest EnviroService, Inc. waste profile #10183, BAE lists the chromium content as "less than 200,000 parts per million (ppm)". The waste had been generated in a chrome plating process and therefore the waste analysis parameters chosen should have been sensitive enough to detect the chromium concentration at least to the Soluble Threshold Limit Concentration (STLC). An accurate chromium VI concentration would be required for proper storage, since chromium VI is a strong oxidizing agent.

Additionally, during this inspection a potential violation of Part 268, Title 40, Code of Federal Regulations, was documented. This includes but may not be limited to:

8. 40 Code of Federal Regulations (CFR), Part 268.7(b)(6):

BAE violated 40 CFR Part 268.7(b)(6) in that BAE shipped hazardous waste off-site for further management but failed to comply with notice and certification requirements applicable to generators under Part 268.7(a).

BAE shipped a California list waste to Northwest EnviroService in Seattle, Washington under manifest number 87041974 on June 10, 1988 (attachment 4). BAE failed to notify the receiving facility that the waste acid solution and spent chrome plating baths were subject to land disposal restrictions.

Upon receipt of this letter, BAE must correct all deficiencies noted in this Report of Violation and submit to the Department written documentation and photographs demonstrating that all violations have been corrected.

Bay Area Environmental
Report of Violation
Page 5

The Department may schedule a reinspection of BAE to verify compliance.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this report please contact Eric Jonsson at (415) 540-2063.

Sincerely,



Eric Jonsson
Hazardous Materials Specialist
Region 2
Toxic Substances Control Program



Patricia C. Payne
Senior Hazardous Materials
Specialist
Region 2
Toxic Substances Control Program

Cert. Mail No. P 841 941 105

cc: See attached mail list

Bay Area Environmental
Report of Violation
Page 6

cc: Lily Wong, U.S. Environmental Protection Agency
EPA, Region IX
215 Fremont Street
San Francisco, CA 94102

Lucille Von Ommering, Chief, Financial Responsibility Unit
Toxic Substances Control Program - Headquarters
Larry Matz, Surveillance and Enforcement Unit
714/744 "P" Street
Sacramento, CA 94234-7320

William Soo Hoo, Toxics Legal Office
Toxic Substances Control Program - Headquarters
714/744 "P" Street
Sacramento, CA 94234-7320

Mary Locke, Chief, Office of Local Enforcement
Toxic Substances Control Program - Headquarters
714/744 "P" Street
Sacramento, CA 94234-7320

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

COPY



September 29, 1989

CERTIFIED MAIL

Mr. Thomas Meichtry, Director
Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

EPA ID No.: CAT080014079

Dear Mr. Meichtry:

REPORT OF VIOLATION

The following Report of Violation is amended to supersede the previous Report of Violation dated April 5, 1989.

On February 24, 1989, the Department of Health Services (the Department) conducted an inspection of Bay Area Environmental, Inc., Richmond, California.

As a result of that inspection, the following violations of hazardous waste statutes and regulations were found:

VIOLATIONS:

1. Title 22, California Code of Regulations, Section 66484(g):

Bay Area Environmental, Inc. failed to submit to the Department an Exception Report for three Uniform Hazardous Waste Manifests that were not returned by the receiving facility within 45 days of the date the waste was accepted by the initial transporter.

2. Title 22, California Code of Regulations, Section 66374(a); Parts IV.2(c)(7), IV.2(e) Hazardous Waste Facility Permit.

Bay Area Environmental, Inc. stored more drums in the flammable storage bay than allowed by the Hazardous Waste Facility Permit.

3. Title 22, California Code of Regulation, Section 66374(1)(1); Parts II.6.(i), Hazardous Waste Facility Permit:

Bay Area Environmental, Inc. increased the storage capacity of the flammable storage bay without providing 30 days prior notice to the Department.

Report of Violation
Bay Area Environmental
Page 2

4. Title 22, California Code of Regulations, Section 66374(m):

Bay Area Environmental, Inc. stored hazardous waste in a modified portion of the facility without submitting to the Department a letter, signed by the permittee and a professional engineer, register in California, stating that the facility had been modified in compliance with the Hazardous Waste Facility Permit.

Upon receipt of this letter, Bay Area Environmental, Inc. must correct all deficiencies noted in this Report of Violation and submit to the Department written documentation and photographs demonstrating that all violations have been corrected.

The Department may schedule a reinspection of Bay Area Environmental, Inc. to verify compliance.

The issuance of this Report of Violations does not preclude the Department from taking administrative, civil, or criminal action as a result of the violation notified herein.

If you have any questions regarding this letter, please contact Ray Balcom at (415) 540-3344.

Sincerely,



James McCammon, Associate
Hazardous Materials Specialist
Region 2
Toxic Substances Control Division



Patricia C. Payne, Senior
Hazardous Materials Specialist
Region 2
Toxic Substances Control Division

Cert. Mail No.: P 692 236 726

cc: Mary Locke, Chief Office of Local Enforcement
Larry Matz, Surveillance and Enforcement
William Soo Hoo, Chief Toxics Legal Office
Rubia Bertram, Financial Responsibility Unit
Lily Wong, Environmental Protection Agency (T-2-4) ✓
Rafat Shahid, Alameda County Health
Kevin James, Office of Attorney General

CW/JMC:om-12

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

COPY 

April 5, 1989

Mr. Thomas Meichtry, Director
Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

EPA ID No. CAT080014079

Dear Mr. Meichtry:

REPORT OF VIOLATION

On 24 February 1988, the Department of Health Services (the Department) conducted an inspection of Bay Area Environmental, Inc., Richmond, California.

As a result of that inspection, the following violations of hazardous waste statutes and regulations were found:

VIOLATIONS:

1. Title 22, California Code of Regulations, Section 66484(g):
Bay Area Environmental, Inc. failed to submit to the Department an Exception Report for three Uniform Hazardous Waste Manifests that were not returned by the receiving facility within 45 days of the date the waste was accepted by the initial transporter.
2. Title 22, California Code of Regulations, Section 66374(a); Parts IV.2(c)(7), IV.2(e) Hazardous Waste Facility Permit.
Bay Area Environmental, Inc. stored more drums in the flammable storage bay than allowed by the Hazardous Waste Facility Permit.
3. Title 22, California Code of Regulations, Section 66374(1)(1); Parts II.6.(i), Hazardous Waste Facility Permit:
Bay Area Environmental, Inc. increased the storage capacity of the flammable storage bay without providing 30 days prior notice to the Department.
4. Title 22, California Code of Regulations, Section 66374(m):
Bay Area Environmental, Inc. stored hazardous waste in a modified portion of the facility without submitting to the

Department a letter, signed by the permittee and a professional engineer, registered in California, stating that the facility had been modified in compliance with the Hazardous Waste Facility Permit.

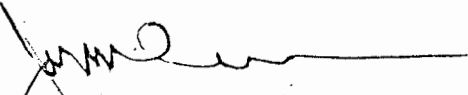
Upon receipt of this letter, Bay Area Environmental, Inc. must correct all deficiencies noted in this Report of Violation and submit to the Department written documentation and photographs demonstrating that all violations have been corrected.


The Department may schedule a reinspection of Bay Area Environmental, Inc. to verify compliance.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations notified herein.

If you have any questions regarding this letter, please contact Ray Balcom at (415) 540-3344.

Sincerely,


James McCammon, Associate
Hazardous Materials Specialist
Region 2
Toxic Substances Control Division


for Patricia C. Payne, Senior
Hazardous Materials Specialist
Region 2
Toxic Substances Control Division

cc: Mary Locke, Chief Office of Local Enforcement
Larry Matz, Surveillance and Enforcement
William Soo Hoo, Chief Toxics Legal Office
Rubia Bertram, Financial Responsibility Unit
Lily Wong, Environmental Protection Agency (T-2-4) ✓
Rafat Shahid, Alameda County Health

CW/JMC:om-12

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



March 22, 1989

Mr. Thomas M. Meichtry, P.E.
President and Chief Executive Officer
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

Dear Mr. Meichtry:

EPA No. CAT080014079

The Department of Health Services has reviewed the information you submitted February 6, 1989, regarding the Report of Violations sent to Bay Area Environmental, 1125 Hensley Street, Richmond, on June 29, 1988. Based on the information submitted in your letters of February 6, 1989 and August 5, 1988, the Department has determined that Bay Area Environmental has corrected the violations listed in the Report of Violations. Thank you for your efforts to return to compliance.

During the inspection of Bay Area Environmental, Inc. on February 24, 1989, you asked whether the 144 hour transfer station exemption applies to wastes removed from the Permitted Storage area when assembling an out-going shipment. Bob Hoffman of the Toxic Substances Control Division legal staff has told me that the exemption given in Section 25123.3(a)(4) and (c) does not apply to a Permitted facility or to wastes held at an off-site facility for 144 hours or more.

Our legal interpretation is that this regulation exempts certain facilities from the requirement to obtain a Hazardous Waste Facility Permit. The exemptions do not apply to facilities that have Hazardous Waste Facility Permits. Based on this determination, a Permitted facility does not have 144 hours for either receiving incoming loads or assembling out-going loads; the hazardous wastes must be placed into the Permitted Storage areas, or loaded out of the Permitted Storage areas, in a reasonable amount of time.

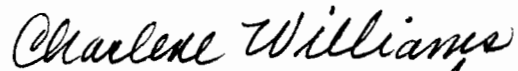
I recommend that BAE include in their Permit renewal a designated contained staging area and a stated length of time for receiving and for assembling loads. This should clarify any ambiguities concerning this issue.

If you have any questions regarding this letter, please call me at (415) 540-2745.

Sincerely,



James McCammon
Associate Hazardous Materials
Specialist
Region 2
Toxic Substances Control Division



Patricia C. Payne *for*
Senior Hazardous Materials
Specialist
Region 2
Toxic Substances Control Division

PCP/JMC:om-4

RECEIVED APR 28 1989

GEORGE DEUKMEJIAN, Governor

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

Jim
COPY



March 22, 1989

Mr. Thomas M. Meichtry, P.E.
President and Chief Executive Officer
Bay Area Environmental, Inc.
1125 Hensley Street
Richmond, CA 94801

Dear Mr. Meichtry:

EPA No. CAT080014079

ICF	TECHNOLOGY
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER _____	DATE _____

The Department of Health Services has reviewed the information you submitted February 6, 1989, regarding the Report of Violations sent to Bay Area Environmental, 1125 Hensley Street, Richmond, on June 29, 1988. Based on the information submitted in your letters of February 6, 1989 and August 5, 1988, the Department has determined that Bay Area Environmental has corrected the violations listed in the Report of Violations. Thank you for your efforts to return to compliance.

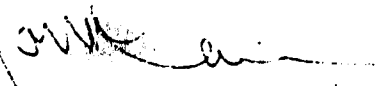
During the inspection of Bay Area Environmental, Inc. on February 24, 1989, you asked whether the 144 hour transfer station exemption applies to wastes removed from the Permitted Storage area when assembling an out-going shipment. Bob Hoffman of the Toxic Substances Control Division legal staff has told me that the exemption given in Section 25123.3(a)(4) and (c) does not apply to a Permitted facility or to wastes held at an off-site facility for 144 hours or more.


Our legal interpretation is that this regulation exempts certain facilities from the requirement to obtain a Hazardous Waste Facility Permit. The exemptions do not apply to facilities that have Hazardous Waste Facility Permits. Based on this determination, a Permitted facility does not have 144 hours for either receiving incoming loads or assembling out-going loads; the hazardous wastes must be placed into the Permitted Storage areas, or loaded out of the Permitted Storage areas, in a reasonable amount of time.

I recommend that BAE include in their Permit renewal a designated contained staging area and a stated length of time for receiving and for assembling loads. This should clarify any ambiguities concerning this issue.

If you have any questions regarding this letter, please call me
at (415) 540-2745.

Sincerely,


James McCammon
Associate Hazardous Materials
Specialist
Region 2
Toxic Substances Control Division


Patricia C. Payne *for*
Senior Hazardous Materials
Specialist
Region 2
Toxic Substances Control Division

PCP/JMC:om-4

DEPARTMENT OF HEALTH SERVICES

211 BUSHLEY WAY
BERKELEY, CA 94704

(415) 540-2043



CAT 0800 14079

April 18, 1984

Mr. Bill Wahbeh
Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

Dear Mr. Wahbeh:

An inspection was made of your facility March 6, 1984, by Charlene Williams of this office and Dan Shane of the Environmental Protection Agency. We were pleased to note that you are in full compliance with all the requirements of your Hazardous Waste Facility Permit.

We look forward to a continued cooperation between the Department of Health Services and Bay Area Environmental in the future. If you have any further questions feel free to contact Charlene Williams of this office.

Sincerely,

for Dwight R. Hoenig, Chief
Toxic Substances Control Division
North Coast California Section

cc: Paul Blais
U.S. Environmental Protection Agency

Daniel R. Bergman
Assistant Director of Health Services
Environmental Health
Contra Costa County

BAY AREA ENVIRONMENTAL COLLECTION/TRANSFER STATION

The following is a list of questions and comments compiled by staff while reviewing the Bay Area Environmental Collection/Transfer Station Operation Plan submitted December 10, 1980.

I. Facility Identifications.

A) Facility Operator. This information is acceptable.

B) Facility Layout

1. There is no scale indicated on the Drawing No. TS-1.
2. Dimensions on Section B-B are inconsistent for depth to the base of slope from grade level.
3. What are the dimensions on the concrete berms?
4. Will a 4" concrete slab be structurally strong enough to support drums and equipment without cracking?
5. Is the sealant to be applied to all of the concrete surfaces? Is it compatible with all the wastes that could possibly be spilled or leaked onto the storage area?
6. How will ponded rainwater be controlled in the storage area?
7. Is the slope of the storage areas sufficient to ensure that drums will not remain in contact with standing liquids for more than one hour?
8. Is there enough storage area within the bermed area to hold at least 10% of the volume of containers or the volume of the largest container, whichever is greater?
9. Will run-on from other areas to the storage area be allowed?
10. Where will empty barrels be stored?
11. Where will barrels be filled?
12. How will traffic be routed on and off-site?
13. Where will wastes be loaded and unloaded?
Is this area designed to handle spills or wash-down off vehicles?

Sealant
applicable
drums

palette

10%

160 drums
slab
pu 740 ft
32 drums
spillage

will be
repackaging
on the slab

continued-2

14. Additional information should be submitted regarding adjacent land use as well as floodplain/flood control information.
15. It appears that ignitable or reactive wastes may be stored within 50 feet of the property line. This would be in violation of 40 CFR 264.176 (Federal requirement).
16. Will a maintenance area be provided at the site? Where will fuel be stored for equipment?
17. The type of fence should be specified. Will the new fence be the same as the old fence?

II. Waste Characterization

1. What is the design storage capacity for each waste type to be received at the facility?
2. Will wastes, other than those types listed, be accepted at the facility? If gases are to be received, how will they be handled?
3. The EPA manual, A Method for Determining Hazardous Wastes Compatibility, EPA-600/2-80-076, should be used as a guide for packaging potential incompatibles.

III. Waste Physical Facilities

A. Facility

1. How long will wastes be storied at the facility?
2. Where will homeowners leave wastes? Where will these wastes be sorted out prior to packing in drums?
3. How will small spills be handled, i.e., quart or pint size bottles?
4. What type of filler is to be used for packing bottles in drums? Some material other than styrofoam should be used i.e., vermiculite.
5. A more thorough description of the water reactive building and the office building should be included.

IV. Facility Equipment and Devices

A. Waste Handling Equipment

1. Is the forklift sparkproof? *yes*
2. Is back-up equipment readily available? *yes*

B. Safety Equipment

1. Two Scott Air Packs should be available at the facility for emergency use.
2. Locations of all safety equipment should be specified. A fire extinguisher should be kept in the office as well as the storage area.
3. An alarm system should be installed to cover the area particularly if only one employee is on-site.

C. Warning Signs

1. Signs must be posted at all points of access to the facility and be legible for a distance of at least 25 feet. The English legend shall read "Caution-Hazardous Waste Storage Area-Unauthorized Persons Keep Out". The Spanish legend shall read, "Cuidado! Zona De Residuos Peligrosos Prohibida La Entrada. A Personas No Autorizadas".
2. No smoking signs shall be posted in storage areas.

D. Lighting

1. The facility should have night time lighting. *Flood lights*

E. Water Supply

1. What measures will be used to ensure that the city water supply is not cross-contaminated?

V. General Operating Procedures

A. Receipt and Identification of Hazardous Waste

1. It is not necessary for the operator to immediately notify DOHS/HMMS of receipt of extremely hazardous wastes. This should show up in the monthly report.
2. Operator qualifications should be more specifically discussed, i.e., types of training pertaining to hazardous waste management.
3. The plan seems to indicate that some wastes may be received without manifests. How will these wastes be managed?
4. Wastes in each drum should be traceable to numbers on waste receipts.
5. Drums stored for more than 90 days must be properly labeled according to DOT regulations.

*operators
should be
aware of
recycling opportunities*

B. Control of Waste at the Facility

1. Where will empty drums be obtained for packing smaller containers?
2. Will drums be emptied? Will drums be washed? If so, how will wash water be handled?
3. What type of inspection schedule will be followed and what sort of things will be included in an inspection?

C. Facility Closure

1. Procedures for closure should be discussed in more detail, i.e., decontamination and removal of contaminated materials.
2. A cost estimate for closure should be provided. This will have to be updated annually.
3. Some financial instrument will need to be arranged to cover closure costs.

continued-5

VI. Personnel

1. Will only one operator be at the site during normal working hours?
2. Will another operator be available to run the site in case of illness etc.?

VII. Contingency Plan

1. Who will clean up spills at the facility?
2. Are emergency coordinators designated in order of responsibility? Are office and home phone numbers listed and up to date?
3. Are site personnel familiar with an evacuation plan should evacuation be necessary?

VIII. Environmental Control Permits

A. Records and Reports

1. The only reports that need to be sent to DOHS/HMMS (through the Sacramento office) are copies of manifests with summary sheets. If wastes are received from other hazardous waste haulers, a master manifest must be compiled.
2. A written inspection schedule and log must be kept at the facility for a minimum of 3 years.
3. A job description must be kept for each position at the facility which is related to hazardous waste. Introductory and continuing training records must be kept at the facility for each employee.
4. A copy of the contingency plan must be retained at the facility as well as submitted to all local and State agencies which may be called upon to provide emergency services.



HAYWARD COMMERCE CENTER, 10510 CADET ROAD, HAYWARD, CALIFORNIA 94545 415-782-7000

January 3, 1991

Mr. Jim Brightlow
United States Environmental
Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

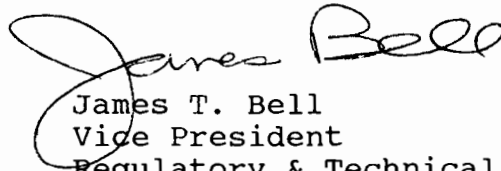
Dear Mr. Brightlow:

As you are aware, California Advanced Environmental Technology Corporation (CAETC) has purchased the Bay Area Environmental (BAE) facility located in Richmond, California.

CAETC is currently operating this facility in accordance with a hazardous waste facility permit issued by the California Department of Health Services (CADHS) dated October 31, 1990. Attached please find one (1) copy of the Part B Application for the proposed operations and modifications to the facility.

If you have any questions, please do not hesitate to contact me at (201) 691-3910.

Sincerely,


James T. Bell
Vice President
Regulatory & Technical
Affairs

JTB/pas

Attachment

Open up soon - 1/20

WARNING LETTER

Have some generations also - me

too - stop by KS

CERTIFIED MAIL NO. P 454 092 069
RETURN RECEIPT REQUESTED

In Reply: T-2-4
Refer to: CAT 080 014 079
~~LOW~~

Robert J. Sisneros
Vice President
Bay Area Environmental
1125 Hensley Street
Richmond, CA 94804

Dear Mr. Sisneros:

On October 8, 1987, an investigation was conducted at Bay Area Environmental (BAE) in Richmond, California, by a representative of Jacobs Engineering Group, Inc. on behalf of the U.S. Environmental Protection Agency (EPA). A copy of the inspection report dated October 1987 is enclosed. In the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act, as amended (RCRA).

The following deficiencies were observed during the records review and facility inspection:

1. 40 CFR §265.13(a)(3)(ii) & (4) *sounds redundant*

BAE has received ~~from off-site~~ shipments of hazardous wastes which the inspector determined to be misclassified by the generator or which were not adequately analyzed by the generator. BAE must inspect each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest. When the results of this inspection indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest, BAE must obtain a detailed chemical and physical analysis of a representative sample of the waste as specified in 40 CFR §265.13(a)(1) & (2). The BAE waste analysis plan indicates that additional analysis will be obtained where the initial inspection (including haz mat) shows that the waste does not match the description on the manifest. However, BAE did not implement the waste analysis plan in that BAE did not ~~in actuality~~ obtain the required detailed chemical and physical analysis of the incoming wastes which have been *lost*

~~Not a valid permit~~
misclassified or inadequately analyzed by the generator. Some of these wastes are identified in Table 4-1 of Attachment Q-1 in the inspection report.

2. 40 CFR §262.41(a)

BAE did not prepare and submit the biennial report required of generators under 40 CFR §262.41(a).

3. 40 CFR §265.73(a) and (b)(1)-(2)

The BAE operating record does not contain the following information:

- a. All method(s) and date(s) of its storage at BAE;
- b. The location of each hazardous waste within BAE and the quantity at each location; and
- c. All cross-references to specific manifest document numbers, if the waste was accompanied by a manifest.

4. 40 CFR §265.73(b)(9)

The operating record does not contain copies of the notices required by generators under 40 CFR §268.7(a)(1).

5. 40 CFR §268.7(a)(1) and (2)

With each off-site shipment of restricted waste, BAE did not consistently provide the treatment facility or disposal facility with the notice or notice and certification required under 40 CFR §268.7(a)(1) or (a)(2), respectively.

6. 40 CFR §268.50(a)(2)

BAE stores several drums of restricted hazardous waste which are not labeled with a specific date each period of accumulation begins.

You are hereby requested to submit a written report within thirty (30) days of receipt of this letter certifying that compliance with the above deficiencies has been achieved. Please include the following information in your report:

1. A statement that BAE will immediately implement all procedures in its waste analysis plan.
2. A copy of the revised portion of the operating record which documents that, effective within fifteen (15) days of receipt of this letter, the operating record will, for all hazardous waste handled on or after that date at BAE, include the information noted in deficiency 3 above.

Shouldn't they be req'd to submit the biennial report?

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address		CAT08000114079		A. State Manifest Document Number 90206624	
4. Generator's Phone (415) 233-8001		BAY AREA ENVIRONMENTAL 1125 HENSLY ST RICHMOND CA 94801		B. State Generator's ID HA-14086018952	
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID 107757	
UNIVERSAL Engineering		CAT0800013469		D. Transporter's Phone 707-746-6699	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID	
9. Designated Facility Name and Site Address		10. US EPA ID Number		F. Transporter's Phone	
CHEMICAL WASTE Management INC 35251 OLD SKYLINE RD KETTERMAN CITY CA 93239		CAT0000646117		G. State Facility's ID CAT0000646117	
H. Facility's Phone		800-222-2964			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. NON RCRA HAZARDOUS WASTE SOLID		008	DM	02.4	10.0 P
b. NON RCRA HAZARDOUS WASTE SOLID		010	DM	00.3	10.0 P
c. WASTE FLAMMABLE LIQUID N.O.S		001	DM	00.3	10.0 P
d. FLAMMABLE LIQUID		001	DM	00.3	10.0 P
15. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
11a) MERCAPTAN CONTAMINATED PIPES & DEBRIS		a. 03		b. 03	
11b) MERCAPTAN CONTAMINATED VILES		c. 0		d. 0	
11c) MERCAPTAN MIXTURE					
15. Special Handling Instructions and Additional Information					
11a, -J76068 11b. K-51432 11c. A-24551 wear gloves and goggles when handling					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
THOMAS OAKLEY FOR BAE		Thomas Oakley		1/02/90	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
HAWES JIM		James R. Hawes		1/02/90	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
Billy C. Reed		Billy C. Reed		1/02/90	
19. Discrepancy Indication Space					
11-b. Received 2 Drums Versus 1 Cone. Resolved w/Transporter. 10/23/90					
11-B. 1 DRUM REJECTED 11/11/90					
11-B. 1 DRUM REJECTED 11/11/90 RESOLVED WITH OFFER PAID BY 11/11/90					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	
Billy C. Reed		Billy C. Reed		1/02/90	

Bay Area Environmental
1125 Kensington Street
Redmond, CA 94004

PERMIT HEADER

FACILITY ID ~~CA5000014079~~

SEQUENCE NO --

NEW ENTRY -

DATE EFFECTIVE

2/2/83

CHANGE ENTRY -

Final

DELETE ENTRY -

	PART-B APPLICATION			PROCESS ISSUED		
	IND.	PROCESS	AMT UNIT	IND.	PROCESS	AMT UNIT
STORAGE						
CONTAINERS	501	410 ?	532 drums	-	-	-
TANKS	-	-	-	-	-	-
WASTE PILES	-	-	-	-	-	-
SURFACE IMPOUNDMENTS	-	-	-	-	-	-
DISPOSAL						
INJECTION WELL	-	-	-	-	-	-
LANDFILLS	-	-	-	-	-	-
LAND APPLICATION	-	-	-	-	-	-
OCEAN	-	-	-	-	-	-
SURFACE IMPOUNDMENTS	-	-	-	-	-	-
TREATMENT						
TANKS	-	-	-	-	-	-
SURFACE IMPOUNDMENTS	-	-	-	-	-	-
INCINERATORS	-	-	-	-	-	-
OTHER	-	-	-	-	-	-

Bay Area Environmental
1125 Kensington Street
Berkeley, CA 94704

PERMIT HEADER

FACILITY ID ~~CA5000014079~~

SEQUENCE NO --

NEW ENTRY -

DATE EFFECTIVE 8/2/83
Genes

CHANGE ENTRY -

DELETE ENTRY -

	PART-B APPLICATION			PROCESS ISSUED		
	IND.	PROCESS AMT	UNIT	IND.	PROCESS AMT	UNIT
STORAGE						
CONTAINERS	<i>501</i>	<i>?</i>	<i>?</i>	-	-----	-
TANKS	-	-----	-	-	-----	-
WASTE PILES	-	-----	-	-	-----	-
SURFACE IMPOUNDMENTS	-	-----	-	-	-----	-
DISPOSAL						
INJECTION WELL	-	-----	-	-	-----	-
LANDFILLS	-	-----	-	-	-----	-
LAND APPLICATION	-	-----	-	-	-----	-
OCEAN	-	-----	-	-	-----	-
SURFACE IMPOUNDMENTS	-	-----	-	-	-----	-
TREATMENT						
TANKS	-	-----	-	-	-----	-
SURFACE IMPOUNDMENTS	-	-----	-	-	-----	-
INCINERATORS	-	-----	-	-	-----	-
OTHER	-	-----	-	-	-----	-



Chemical Waste Management, Inc.

Post Office Box 471
Kettleman City, California 93239
209/386-9711

DATE: 10 / 5 / 90
M D Y

Regional Administrator, Region 1
DEPARTMENT OF HEALTH SERVICES
Toxic Substances Control Program
10151 Croydon Way
Sacramento, CA 95827-2106

Re: Chemical Waste Management, Inc. CAT 000 646 117

This letter is to inform your office of the following discrepancy found on a shipment of material to the Kettleman Hills Facility:

- ☐ [A] Significant discrepancy not resolved within 15 days of waste receipt. Manifest copy attached.
☐ [B] Material received without a manifest.
☐ [C] Transporter did not display a valid Vehicle Certificate per Health & Safety Code 25168.3.
☒ [D] Material rejected.

Complete the following for the letter(s) checked above:

[A CD] Manifest No: 90206573
[ABCD] Date received/rejected: 8/15/90
[ABCD] Waste Description: Lab Pack
[ABCD] Waste Quantity: 3 drums
[ABCD] Generator Name/ID: Bay Area Env.
[ABCD] Generator Address: U
[CD] Transporter Name/ID: Universal
[CD] Transporter Address: _____
[D] Transporter Vehicle Descr: _____
[D] Transporter Lic. Plate No./State: _____
[B] Waste Management Method: _____

Explanation of [A] attempts to reconcile discrepancy not resolved within 15 days of receipt, or [B] why the material was unmanifested (if known), or [D] why the material was rejected:

Unapproved Lab Packs

If you need further information, please call 209/386-9711.

cc: EPA San Fran; DHS-Permits Sacto; DHS-S&E Fresno; RWQCB Fresno; KCDPH Hanford; Generator; CWMI EMD Files

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Bay Area Environmental 1125 Hensley Street Richmond, CA 94801		CAT080014079		A. State Manifest Document Number 90206573	
4. Generator's Phone (415) 233-8001		5. Transporter 1 Company Name Universal Engineering		B. State Generator's ID H1A-HQ36012952	
6. US EPA ID Number CAT080013469		7. Transporter 2 Company Name		C. State Transporter's ID H1A-HQ36012952	
8. US EPA ID Number		9. Designated Facility Name and Site Address Chemical Waste Management 35251 Old Skyline Road Kettleman City, CA 93239		D. Transporter's Phone 707-233-6699	
10. US EPA ID Number CAT000646117		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		E. State Transporter's ID	
a. Waste Poisonous Solid, n.o.s. Poison B UN2811 (Household Labpacks)		12. Containers No. Type		F. Transporter's Phone	
b. Non RCRA Hazardous Waste Solid (Hydrocarbon Contaminated Soil)		0.15 DM 04500 P		G. State Facility's ID CAT000646117	
c.		0.71 DM 39.150 P		H. Facility's Phone 18002222904	
d.		13. Total Quantity		14. Unit Wt/Vol	
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		Waste No.	
a. H62200		03		612	
b. H62121		03		Not Regulated	
15. Special Handling Instructions and Additional Information Wear protective gear. Avoid breathing vapors. In case of accident or spill do not wash into sewer or waterways. If unable to deliver return to generator.		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		17. Transporter 1 Acknowledgement of Receipt of Materials	
Printed/Typed Name DARA TURCHI for BAE		Signature Dara Turchi		Month Day Year 08/15/90	
Printed/Typed Name Tim Wells		Signature Tim Wells		Month Day Year 08/15/90	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space 11a. 3 drums returned at Generator's request - HST 8/15/90		20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name Ricardo S. Abelleira	
Signature Ricardo S. Abelleira		Month Day Year 08/15/90			

RICHMOND NEIGHBORHOOD COORDINATING
COUNCIL

CAT080014079

May 31, 1983

RECEIVED
JULY 1, 1983
RICHMOND
COMMUNITY

11:20 8 46 AM '83

To the Mayor and Members
of the City Council
City of Richmond
27th & Barrett Avenue
Richmond, CA 94804

Dear Gentlemen:

This letter is written to inform you that Mr. J. J. Magana's plan to locate a hazardous waste facility in the Hensley Industrial District does not comply with the Redevelopment Agencies Amended Urban Renewal Plan for Project Area 8-A.

Gentlemen I would also like to point out to you the devious manner in which Mr. Magana went about obtaining permits to construct this hazardous waste facility.

First Mr. Magana applied to the City for a Building Permit to construct a warehouse at 1120 Hensley Street, to store truck parts. Then he applied to the State for a license under the name of Bay Area Environmental to store hazardous waste materials at the same address.

Mr. Magana did all of this prior to obtaining a Conditional Use Permit which is required according to a provision in Section 15.04120 of the municipal code and must be approved by the Planning Commission.

In further checking the validity of this provision through the City Attorney's Office, I was told that Mr. Magana must infact have a Conditional Use Permit to store hazardous toxic wastes in the Hensley District.

Therefore, Gentlemen since Mr. Magana did not follow proper procedures and the development of a toxic waste facility would severely curtail future development in the Hensley District.

We are requesting that Mr. Magana's permit be revoked and the land reverted to the Redevelopment Agency in accordance with Section E, Page 8 of the Amended Urban Renewal Plan for Project Area 8-A Hensley Industrial District.

Sincerely,

Lillie M. Jones

LILLIE M. JONES, CHAIRPERSON
RICHMOND NEIGHBORHOOD COORDINATING COUNCIL

cc: Richmond Planning Commission
North Richmond Homeowners & Concerned Citizens Council
Mr. Townsend Brady, Sealy Mattress Company
The Democratic Party's Committee on Hazardous Waste
Jean Seri, Mayor of El Cerrito
Environmental Protection Agency, Washington, D. C. ✓
Citizens for a Better Environment
Mr. J. J. Magana
The State Department of Health Services'

Supervisor Tom Powers

**HAZARDOUS
MATERIALS
MANAGEMENT INC.**

P.O. BOX 2026 CASTRO VALLEY, CA 94546 (415) 882-8001

233-8001

July 13, 1981

Ms. Susi Jackson, A-3-3
U.S. EPA
215 Fremont Street,
San Francisco, CA 94105

Re; Bay Area Environmental
EPA I.D. # 080014079

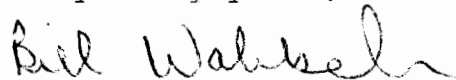
Dear Ms. Jackson:

We have reviewed the quantities which the Bay Area Environmental Company would handle at its proposed transfer station, and found it to be less than 1000 kilograms per month from one generator. The containers will be stored for a period of ten days or less.

Based on the above information, and in accordance with 40 CFR Parts 261.5 a, and 263.12, this operation is exempted from obtaining a federal permit under RCRA. We submit our request to withdraw the Bay Area Environmental application from further review.

If you need more information, please call me.

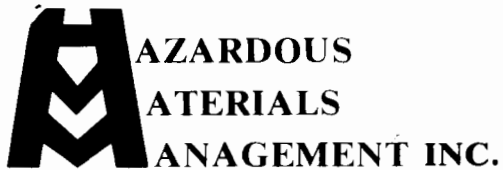
Very truly yours,



Bill Wahbeh, P.E.

NW/mw

cc: Mr. Harry Seraydarian-DOHS.
MDW Industrial Services.
O. E. Erickson.



P.O. BOX 2026 CASTRO VALLEY, CA 94546 (415) 582-8171

May 15, 1983

EPA, Region IX
215 Fremont
San Francisco, CA 94105

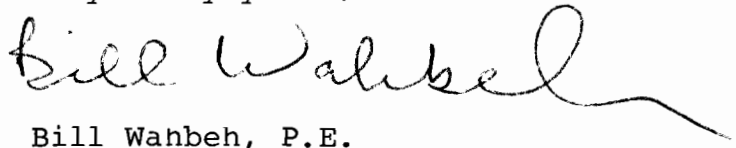
Attention: Mr. Bill Wilson
Subject: Bay Area Environmental
EPA ID# CAT 080014079

Dear Mr. Wilson:

This letter is to inform you that the above proposed facility has a new proposed location: 1125 Hensley Street, Richmond, Contra Costa County.

If you need more information, Please call me.

Very truly yours,



Bill Wanhbeh, P.E.

cc: Charlene Williams, DOHS

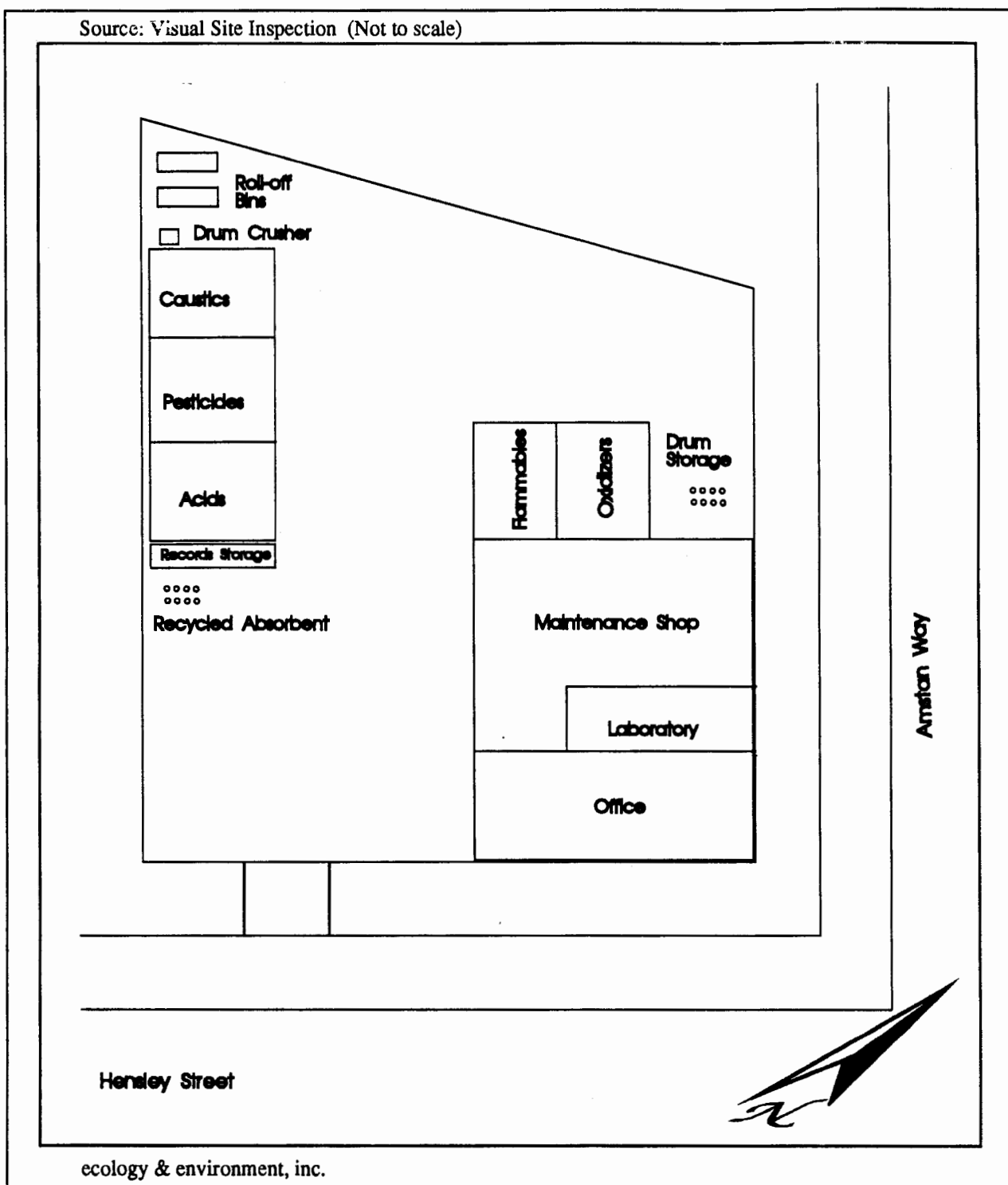


FIGURE 2
FACILITY MAP
BAY AREA ENVIRONMENTAL
1125 HENSLEY STREET
RICHMOND, CALIFORNIA

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded area is not required by Federal law

3. Generator's Name and Mailing Address

Bay Area Environmental
1125 Hensley Street Richmond CA 94804
4. Generator's Phone (415) 333-8201

A. State Manifest Document Number

87041676

B. Generator's ID

11111236011891521

C. State Transporter's ID

301464

D. State Transporter's ID

415 333-8201

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

CA0509094771

H. Facility's Phone

415 228-5100

5. Transporter 1 Company Name

I.T. Transportation

6. US EPA ID Number

CA0101010150911

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

I.T. CORPORATION MARTINEZ
896 WATERBIRD WAY
MARTINEZ, CA 94553

10. US EPA ID Number

CA0101010194771

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. UN 2796 CORROSIVE MATERIAL
Waste, Battery Fluid, Acid (EPA corrosivity)

12. Containers

No. Type

11 TT

13. Total Quantity

35

14. Unit Wt/Vol

1100 G

15. Waste N

State 7C

EPA/Other D00

State

EPA/Other

State

EPA/Other

State

EPA/Other

State

EPA/Other

State

EPA/Other

State

EPA/Other

State

EPA/Other

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EPA/Other

State

EPA/Other

J. Additional Descriptions for Materials Listed Above

Waste Battery Acid

REF MN# 87087378

K. Handling Codes for Wastes Listed Above

a. 15/06

c.

d.

15. Special Handling Instructions and Additional Information

Wear acid suits + gloves + goggles

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper ship name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

* Joe Lynch

Signature

* Joe Lynch

Month Day

10/8/12

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

* TETRA SUN

Signature

* TETRA SUN

Month Day

10/8/12

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

* SUE DOUGLAS

Signature

* Sue Douglas

Month Day

10/8/12

87041676

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY

Ms. April Katsura
December 21, 1987 pg.2

Manifest No. 87090014

On May 7, 1987, Hazardous Waste Oil N.O.S. was transported in vehicle #706520 from DRMO Ft. Ord to the alternate TSD, IT San Jose Facility (CAD000633115). The designated TSD, IT Vine Hill (CAD000094771) did not have sufficient capacity to accept the waste stream on that date. On May 19, 1987, the waste was transported in vehicle #706520 to the IT Vine Hill Facility accompanied by manifest no. 87087020, where it was accepted for disposal. The waste was remanifested, as it remained at the IT San Jose Facility longer than 96 hours.

Manifest No. SS86-0007

On April 21, 1987, IT San Jose (CAD000633115) accepted the following wastes:

Hazardous waste, Liquid, NOS, ORM-E NA9189
9-containers 5-gallons each

Waste, Flammable Liquid, NOS, Flammable Liquid UN1993
1-drum 55-gallons

Waste, Flammable Liquid, NOS, Flammable Liquid UN1993
1-drum 55-gallons

The EPA waste numbers were identified in the discrepancy space by the TSDF on page 1 section I, and 19. Page 2 section 28 of the manifest was erroneously completed by the generator. This discrepancy was not documented by the TSDF in section 35.

The waste from the 11 containers was consolidated into a vacuum truck, vehicle #801766, remanifested with document no. 87088052 and transported to IT Vine Hill Facility (CAD000094771) on June 3, 1987. The eleven empty containers were transported to Casmalia Resources (CAD020748125) accompanied by manifest no. 87088102 on July 23, 1987.

Manifest No. 86499615

Section 11 (a) of manifest no. 86499615 lists one drum of RQ, Waste Flammable Solid, Poisonous, N.O.S., Flammable Solid, UN2926, (Beryllium) which was rejected by the designated TSDF, Casmalia Resources (CAD020748125), as containing incompatible materials. The drum contained Beryllium waste and TCE contaminated rags. This drum was returned to the alternate TSDF, IT San Jose (CAD000633115), on March 31, 1987.

6-3-87

Hauler Generator	Manifest #	PD#	Location	Amount	Trailer #	C
(14) ITW Douglas Aircraft	86234181	4865	15	440	256SV	PH-B SN-5C
(15) ITSD Deutsch	86234392	JJ	15	1045	JJ	"
1 ITMTZ CARPENTER TECH.	87148279	4865	18	1900	159V	PH-B SN-5C
2 JPTANS CHEVRON USA	84692874	(87) 4704	105	9500	280V	PH-B SN-5C
3 ITMTZ Douglas Aircraft	86234382	(87) 4704	103	300	811	PH-B SN-5C
4 Gundersen Angus Biotech	86043309	4998	18	700	31	PH-B SN-5C
5 ITMTZ FMC CORP	86291975	6487	15	8000	284V	PH-B SN-5C
6 ITMTZ STAUFFER CHEM	87035100	86735-8716	16	3360	139V	PH-B SN-5C
7 ITMTZ AeroJet	87219106	84562	103	4500	269V	PH-B SN-5C
8 ITMTZ Lockheed	86417043	88499	14	4200	194AV	PH-B SN-5C
9 ITMTZ Lockheed	86417044	8487	15	1500	291V	PH-B SN-5C
10 ITMTZ Intel	87173340	82196	13	4197	115AV	PH-B SN-5C
11 ITMTZ ITCorp collection/TRANS	87088052	88677	14	155	145V	PH-B SN-5C
12 ITMTZ Pacific Bell	87087169	84343	13	550	198A	PH-B SN-5C
13 ITMTZ Grow Group	84465669	82261	103	4800	100V	PH-B SN-5C
14 ITMTZ Nuodex	86057902	82254	6-4-87	4725	138V	PH-B SN-5C
15 ITMTZ Triatek	87087145	82514	13	3400	146V	PH-B SN-5C
16 U E Nuodex Inc	86057901	82254	105	4500	108	PH-B SN-5C
17 ITCorp Grow Group	84465670	82261	103	4800	288V	PH-B SN-5C
18 JP DWR	87133762	87599	105	4200	704V	PH-B SN-5C
19 IT Proficient Food	87088050	88351	105	3060	103V	PH-B SN-5C



INTERNATIONAL
TECHNOLOGY
CORPORATION

575 Pacheco Boulevard • Martinez, CA 94553
Telephone: (415) 228-5100

HAZARDOUS WASTE PREDISPOSAL EVALUATION

B. GENERATOR INFORMATION:

GENERATOR NAME ALASKA PIPE LINE
MAILING ADDRESS 5317 MINNESOTA DR.
ANCHORAGE ALASKA 99502
SITE ADDRESS _____
EPA ID# AKD9809B3001
TECHNICAL CONTACT DAVE SUNDAY PHONE 907-2058598

C. CUSTOMER INFORMATION:

CUSTOMER NAME _____
ADDRESS SAME
CONTACT _____
PHONE _____
TRANSPORTER IT CORP.
EPA ID# CAD000058917

A.
I
T
U
S
E
O
N
L
Y

EVALUATION # 23908
WASTE STREAM# 58677
ACCT MGR NOBON
DATE SUBMITTED 5/8/87
CUSTOMER ID# 150136
ANALYTICAL CHARGES \$1250
P O / CONTRACT# _____
BILLING INSTRUCTIONS 2221

D. WASTE DESCRIPTION:

WASTE SOLVENTS
C RATING PROCESS ARTS CLEANING
VOLUME 200 GALLONS _____ CUBIC YARDS
FREQUENCY ☒ One Time ☐ Week ☐ Month ☐ Quarter ☐ Year
METHOD OF SHIPMENT ☒ Bulk Liquid ☐ Bulk Solid ☐ Drums
DRUM TYPE AND SIZE _____

E. SHIPPING INFORMATION:

D O T PROPER SHIPPING NAME: WASTE FLAMMABLE L.I.Q.U.I.D. NOS
R Q UN/NA# 199-3
HAZARD CLASS FLAMMABLE
RCRA WASTE? ☒ Yes ☐ No CODE D001
CA HAZARDOUS WASTE? ☒ Yes ☐ No CODE 214
CA RESTRICTED WASTE? ☐ Yes ☒ No

F. HAZARDS:

	LOW	MOD	HIGH	YES	NO
INHALATION	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DERMAL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ORAL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FLAMMABLE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
REACTIVITY	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
MATERIAL SAFETY DATA SHEETS ATTACHED? <u>NO</u>					
SPECIAL HANDLING _____					

G.

COLOR BLACK
ODOR SOLVENT
☒ Mild ☐ None
☐ Strong

H. PHYSICAL STATE:

☒ Liquids 100 % Free Liquids
☐ Solids ☒ Single Layer
☐ Sludge ☐ Double Layer
☐ Powder ☐ Multi-Layer

I. pH:

UNK
☐ 1-2 ☐ 10-12
☐ 2-6 ☐ >12
☐ 6-8 ☐ _____ Exact
☐ 8-10

J. NORMALITY:

UNK
☐ 0.1-1.0 ☐ 4.1-5.0
☐ 1.1-2.0 ☐ 5.1-6.0
☐ 2.1-3.0 ☐ >6.0
☐ 3.1-4.0 ☐ _____ Exact

K. SPECIFIC GRAVITY:

UNK
☐ <0.8 ☐ 1.4-1.7
☐ 0.8-1.0 ☐ >1.7
☐ 1.0-1.2 ☐ _____ Exact
☐ 1.2-1.4

L. FLASH POINT:

UNK
☐ 100F
☐ 100-140F
☐ 140-200F
Method _____

M. CHEMICAL COMPOSITION:

cleaning solvents 100 %
AC TYPES _____
BASE TYPE _____
OXIDIZER TYPE _____
WATER _____
OIL _____
TOTAL 100%

UNK YES NO

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CYANIDES	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	FORMALDEHYDE	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PCB	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PHENOLS	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	SULFIDES	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	AMMONIA	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	DIOXINS	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PESTICIDE	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PESTICIDE GROUP	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	HALOGENATED ORGANICS	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	OTHER	PPM

N. METALS:

TOTAL		SOLUBLE	
Ti	PPM	Ti	PPM
As	PPM	As	PPM
Hg	PPM	Hg	PPM
Se	PPM	Se	PPM
Pb	PPM	Pb	PPM
Cd	PPM	Cd	PPM
Ni	PPM	Ni	PPM
Cr	PPM	Cr	PPM
Cr+6	PPM	Cr+6	PPM
V	PPM	V	PPM
Be	PPM	Be	PPM
Cu	PPM	Cu	PPM
Fe	PPM	Fe	PPM
Co	PPM	Co	PPM
Zn	PPM	Zn	PPM
OTHER _____		OTHER _____	

O. ANALYTICAL INSTRUCTIONS:

☒ STANDARD PREDISPOSAL ☐ RUSH (subject to surcharge) ☐ REQUEST FOR ANALYSIS
SPECIFIC INSTRUCTIONS: * CONTACT KEITH CARTER AS SOON AS RESULTS BECOME AVAILABLE

P. CERTIFICATION: I HEREBY CERTIFY THAT TO THE BEST OF MY KNOWLEDGE THE ABOVE INFORMATION AND ATTACHMENTS FULLY AND ACCURATELY CHARACTERIZE THE CHEMICAL AND PHYSICAL PROPERTIES OF THE WASTE STREAM. I UNDERSTAND THAT THIS SAMPLE IS ASSUMED BY IT CORPORATION TO BE REPRESENTATIVE OF THE WASTE STREAM AND THAT ACCEPTABILITY AND PRICE ESTIMATES BASED ON THIS SAMPLE MAY CHANGE ACCORDING TO THE COMPOSITION OF ACTUAL WASTES ANALYZED AT TRUCK RECEIVING.

NAME KEITH CARTER

SIGNATURE Keith Carter

DATE 5/8/87

PHONE 83412

RECEIVED MAY 18 1987

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # 17-05-059
JOB # 88677
SAMPLE # 01 OF 1

Generator name: ALYESKA PIPELINE SERVICE CO.
Waste description: WASTE SOLVENTS
Generating Process: PARTS CLEANING
Volume / frequency: 200 GAL/ONE TIME

TEST	RESULT	UNITS
HCVP	4000	ppm
DENSITY	840	G/L
PH	NA	pH
NORMALITY	NA	N
SON	NA	%
CN	NA	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
XS OXIDANT	NA	
FLASHPOINT	29	DEG/C
AQUEOUS	TRACE	%
SOLID	TRACE	%
OIL	ND	%
POLAR	19	%
NONPOLAR	81	%
HALOGENATED	*	
PHENOL	*	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	ND (1)	ug/kg
PHENOL	* 12000	ppm
CRESOL	65000	ppm
HALOGENATED	* 1.7	%

RESULTS BY IC ANALYSIS

TEST	RESULT	UNITS
CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cu	12	ppm
Na	ND @ 10	ppm
Cr	20	ppm
Co	NA	ppm
Be	ND @ 0.1	ppm
Ca	ND @ 10	ppm
Fe	NA	ppm
Cd	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

* Hg by cold vapor

LAB MANAGER: *[Signature]*

DATE: 6-1-87

ACCEPT/REJECT: *[Signature]*

REASON: *[Signature]*

TSDF MANAGER: *[Signature]*

DATE: 6/6/87

TSD FACILITY: *[Signature]*

SPECIAL SCHEDULING REQ.: *[Signature]*

TREATABILITY PLACEMENT: *[Signature]*

Waste to be landfilled and incinerated

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 980983001		Manifest Document No. SS86-0007		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address Alyeska Pipeline Service Co. AMF-5317 Minnesota Dr., Anchorage, Ak. 99502		4. Generator's Phone (907) 265-8598		5. Transporter 1 Company Name Lynden Transport, Inc.		6. US EPA ID Number AKD009504457	
7. Transporter 2 Company Name Totem Ocean Trailer Express		8. US EPA ID Number AKD000800888		9. Designated Facility Name and Site Address IT Corp. Transfer Site 3010 Zanker Rd. San Jose, Ca. 95131		10. US EPA ID Number CAD000633115		A. State Manifest Document Number	
								B. State Generator's ID	
								C. State Transporter's ID	
								D. Transporter's Phone	
								E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID	
								H. Facility's Phone 408/263-7250	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	
						No. Type		14. Unit Wt/Vol	
a. X Hazardous Waste, Liquid, NOS ORM-E NA9189						9 DR		405 GL	
b. X Waste, Flammable Liquid, NOS Flammable Liquid UN1993						1 DR		55 GL	
c. X Waste, Flammable Liquid, NOS Flammable Liquid UN1993						1 DR		55 GL	
d.									
1. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above			
a. Analysis attached									
b. Analysis attached									
c. Analysis attached									
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.									
Printed/Typed Name BILLY M RADFORD					Signature <i>Billy M Radford</i>			Month Day Year 3 30 87	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name CHUCK ADAMS					Signature <i>Chuck Adams</i>			Month Day Year 3 30 87	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name TED DE BOER					Signature <i>Ted De Boer</i>			Month Day Year 3 31 87	
19. Discrepancy Indication: <i>Manifest document number is the State Manifest</i> <i>SEC. I A. 541/EXEMPT document number (Item A)</i> <i>B. 214/0001</i> <i>C. 214/0001</i> <i>(2) PSN on Waste label for item C is Waste Combustible liquid NOS</i>									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name J.E. WYCOFF					Signature <i>J.E. Wycoff</i>			Month Day Year 4 2 87	

**UNIFORM HAZARDOUS
WASTE MANIFEST
(Continuation Sheet)**

21. Generator's US EPA ID No.

AKD980983001

Manifest Document #

SS86-0007

22. Page

2

Information in the shaded
areas is not required by Federal
law.

23. Generator's Name

Alyeska Pipeline Service Co.
AMF-5317 Minnesota Dr., Anchorage, Ak. 99502
907/265-8598

L. State Manifest Document Number

M. State Generator's ID

24. Transporter Company Name

Lynden Transport, Inc.

25. US EPA ID Number

WAD002709260

N. State Transporter's ID

O. Transporter's Phone

26. Transporter Company Name

Tri State Motor Transit

27. US EPA ID Number

MOD095038998

P. State Transporter's ID 20026822

Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers

No.

Type

30.
Total
Quantity31.
Unit
Wt/VolR.
Waste No.

a.	X	Hazardous Waste, Liquid, NOS	HA9189	9	DR	55	GL	
b.	X	Waste, Flammable Liquid, NOS	UN1993	1	DR	55	GL	
c.	X	Waste, Flammable Liquid, NOS	UN1993	1	DR	55	GL	
d.								
e.								
f.								
g.								
h.								
i.								

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

34. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

35. Discrepancy Indication Space

① Manifest document number is the State Manifest document number (Item L)
② ASN on Waste label for item C is White Corrosive liquid NOS.



CHEMICAL & CYTOLOGICAL LABORATORIES OF ALASKA, INC.

ANCHORAGE INDUSTRIAL CENTER 5633 B STREET ANCHORAGE, ALASKA 99512
TELEPHONE (907) 562-2343



ANALYTICAL REPORT

Action File	RECEIVED	Copy INFO
	NOV 06 1986	
CLIENT	SURPLUS SALES Alyeska, Anchorage	TAPS 3747 070

CLIENT Alyeska Pipeline Service

ADDRESS 1835 S. Bragaw

Anchorage, AK 99512

REFER QUESTION TO: Daniel J. Bacon

APPROVED BY: Stephen C. Ede *[Signature]*

SAMPLES RECEIVED: 5/6/86

SAMPLES COLLECTED:

DATE ANALYZED: 5/16/86

LAB SAMPLE NO. 2779-1

CLIENT SAMPLE I.D.: Photographic darkroom Reversal Proc

MATRIX: Liquid

This is the 'before' to.

METHOD: SW 846

	RESULTS	UNITS	MAXIMUM LIMITS
EP TOXICITY: ARSENIC	0.001	mg/l	5.0
BARIUM	0.07	mg/l	100.0
CADMIUM	ND (0.01)	mg/l	1.0
CHROMIUM	43	mg/l	5.0
LEAD	ND (0.05)	mg/l	5.0
MERCURY	ND (0.0002)	mg/l	0.2
SELENIUM	0.010	mg/l	1.0
SILVER	0.60	mg/l	5.0
CORROSIVITY, pH	7.5		2.5-12.5 (Allowal Range)
FLAMMABILITY, °F	Greater Than 200		min. 140
REACTIVITY	Non Reactive; cyanide present - less than 1 mg/l		
SPECIFIC GRAVITY @ 72 °F	1.0073		

ND = NONE DETECTED
DETECTION LIMIT IN ()

RESIDUAL SAMPLES WILL BE HELD UNTIL: 6/16/86

INVOICE # 37501



CHEMICAL & GEOLOGICAL LABORATORIES OF ALASKA, INC.

ANCHORAGE INDUSTRIAL CENTER 5633 B STREET ANCHORAGE, ALASKA 99518
TELEPHONE (907) 552-2343



ANALYTICAL REPORT

CLIENT Alveska Pipeline Service Co. CLIENT P. O. # TAPS 3747, W) #070
ADDRESS 1835 S Bradaw SAMPLES RECEIVED: 9/5/86
Anchorage, AK 99512 SAMPLES COLLECTED: --
REFER QUESTION TO: Daniel J. Bacon DATE ANALYZED: 9/15/86
APPROVED BY: Stephen C. Ede *scg* LAB SAMPLE NO. 4119-7

CLIENT SAMPLE I.D.: SDR SS 86-0007
Container #2, Used Stoddard Solvent

MATRIX: Solvents

METHOD: In Accordance with EPA SW846

	RESULTS	UNITS	MAXIMUM LIMITS
EP TOXICITY: ARSENIC	ND (0.1)	mg/l	5.0
BARUM	1.0	mg/l	100.0
CADMIUM	0.5	mg/l	1.0
CHROMIUM	0.8	mg/l	5.0
LEAD	6.2	mg/l	5.0
MERCURY	0.08	mg/l	0.2
SELENIUM	ND (0.1)	mg/l	1.0
SILVER	ND (0.1)	mg/l	5.0
CORROSIVITY, pH	6.2		2.5-12.5 (Allowa Range)
FLAMMABILITY, °F	115	min.	140
REACTIVITY	Non Reactive		
SPECIFIC GRAVITY, @ 68°F	0.8071		
POLYCHLORINATED BIPHENYLS (PCB)	ND (1) ppm		
TOTAL HALOGENS	5,680 ppm		

RESIDUAL SAMPLES WILL BE HELD UNTIL: 10/24/86

ND = NONE DETECTED
DETECTION LIMIT IN ()

INVOICE # 40267



CHEMICAL & GEOLOGICAL LABORATORIES OF ALASKA, INC.

ANCHORAGE INDUSTRIAL CENTER 5633 B STREET ANCHORAGE, ALASKA 99518
TELEPHONE (907) 562-2343



ANALYTICAL REPORT

CLIENT Alyeska Pipeline Service Co. CLIENT P. O. # Bill Radford
TAPS 3747/WO #083
ADDRESS P.O. Box 196606 SAMPLES RECEIVED: 3/6/87
Anchorage, AK 99519-6606 SAMPLES COLLECTED: --
REFER QUESTION TO: Daniel J. Bacon DATE ANALYZED: 3/6 - 3/24/87
APPROVED BY: Stephen C. Ede JS LAB SAMPLE NO. 5596

CLIENT SAMPLE I.D.: SDR #SS87-0010, Used Carbosol
Container 1

MATRIX: Liquid

METHOD: SW 846

	RESULTS	UNITS	MAXIMUM LIMITS
EP TOXICITY: Arsenic	0.10	mg/l	5.0
Barium	1.4	mg/l	100.0
Cadmium	124	mg/l	1.0
Chromium	334	mg/l	5.0
Lead	5.2	mg/l	5.0
Mercury	ND (0.1)	mg/l	0.2
Selenium	0.15	mg/l	1.0
Silver	0.39	mg/l	5.0
CORROSIVITY, pH	9.50		2.5-12.5
FLAMMABILITY, °F	85		(ALLOWABLE RANGE Min. 140)
REACTIVITY	Non Reactive		
TOTAL HALOGENS	14,000 ppm		
POLYCHLORINATED BIPHENYLS, (PCB)	ND (1)		
SPECIFIC GRAVITY @ 68°F	1.0069 ppm		

ND. = NONE DETECTED
DETECTION LIMIT IN ()

RESIDUAL SAMPLES WILL BE HELD UNTIL: _____

INVOICE # 5596

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.
C A D 0 0 0 6 3 3 1 1 5

Manif
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

IT CORP. COLLECTION/TRANSFER FACILITY
3010 Zanker Road San Jose, CA. 95134

4. Generator's Phone (408) 263-7250

5. Transporter 1 Company Name
IT CORPORATION

6. US EPA ID Number
C A D 0 0 0 0 5 8 9 1 7

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

IT CORP. VINEHILL FACILITY
896 Waterbird Way
Martinez, CA. 94553

10. US EPA ID Number
C A D 0 0 0 0 9 4 7 7 1

A. State Manifest Document Number

87088052

B. State Generator's ID

HYH936-006932

C. State Transporter's ID

801766

D. Transporter's Phone 415-392-9100

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

CAD0000094771

H. Facility's Phone

415-392-9100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

1. Waste No.

a. HAZARDOUS WASTE LIQUID, NOS
ORM-E

NA 9189

0 0 1 T T

4 5 G

State
541

EPA/Other
RCRA EXEMPT

b. WASTE FLAMMABLE LIQUID, NOS
FLAMMABLE LIQUID

UN 1993

SEE
ABOVE

5 5 G

State
214

EPA/Other
D001

c. WASTE FLAMMABLE LIQUID, NOS
FLAMMABLE LIQUID

UN 1993

SEE
ABOVE

5 5 G

State
214

EPA/Other
D001

d. *155 G TOTAL
GALLONS

J. Additional Descriptions for Materials Listed Above

SEE ATTACHED MANIFEST
SS86-0007 (State of Alaska)
*LIQUIDS PUMPED FROM DRUMS FOR BULK DISPOSAL.
ALL LIQUIDS PUMPED INTO VACUUM TRUCK FOR TRANS.

K. Handling Codes for Wastes Listed Above

a. 15/86

15. Special Handling Instructions and Additional Information

AVOID SKIN CONTACT/WEAR PROTECTIVE CLOTHING

ITEC/VH W/S# 88677

DOT-E-7476 PH. 7

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Keith A. Carter

Signature

Keith A. Carter

Month Day Year

06 03 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DAVIS NICE 199-145V

Signature

Paul Nail

Month Day Year

06 03 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

RCRA D001

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Karen Hoffmann

Signature

Karen Hoffmann

Month Day Year

06 03 87



INTERNATIONAL
TECHNOLOGY
CORPORATION

HAZARDOUS WASTE DISPOSAL LOCATION FORM

Document No.

Site VH ☐ Tank
Unloading Station 14 ☐ Pond
Designated By JW ☐ Landfill

DRIVER PROTECTION GEAR REQUIRED

H & S REQUIREMENTS

Goggles or ☒ Face Shield ☒ Gloves ☐ Protective Clothing

Respiratory ☐ Hard ☐ Other ☐
Protection Hat

FOR WASHOUT: ☐ Face Shield ☐ Gear ☐ Rubber Gloves

Generator IT corp collection / TRASH
Hauler IT MTR
Driver D. Wice
Truck & Trailer No. 145V
Material Description AS, Barium, Pb, metals
Time In 3:00:00
Time Out 3:27:11
Sample No. 11

CONTENTS
Concentration Charge Y/N
pH Level 7.2
Density 1.140 G/L
Normality (NM) <.1 N
HCVP (HC) 1100 PPM
Phenols (PN) 2200 PPM
Sulfides (SL) ND PPM
Cyanides (CN) ND PPM
Ammonia (AM) ND PPM
Formaldehyde (FD) ND PPM
Oil (OL) 1 %
Solids (SD) 15 %
Solids on Neutralization (SN) ND %

SOLIDS
% Floating = NA
% Suspended = NA
% Settled = NA
% Other = 15

Date 06-03-87
Job No. 150136
Phase Task Sub-Task
Profit Center 2472
Disposal Site Type TK ☒ PD ☐ LF ☐

SOLVENTS
Polar (PL) 1 %
Nonpolar (NP) 2 %
Halogenated (HA) 200 mg/l

METALS
Concentration Charge Y/N
Nickel (Ni) 170
Lead (Pb) <10
Mercury (Hg) ↓
Cadmium (Cd) ↓
Selenium (Se) ↓
Chromium 6 (Cr) NA
Arsenic (As) <10
Thallium (Tl) ↓
Copper (Cu) ↓

Waste Manifest No. 87088052
Generated Out of State Y ☐ N ☒
Intersite Transfer Y ☐ N ☒

OTHER CONTENTS
Site Monitoring (MO) EA
PCB's ND < 1 mg/l
Sulfides in Oil ND
Fluorides NA

OTHER METALS
Beryllium (Be) <1
Iron (Fe) <10
Total Chromium 13
Zinc (Zn) 63

Waste Stream No. 88677
Hazardous Classification H
Product Code DN601/DT201
Qty. 155 U.O.M. GAL
Actual Tons Disposed

OTHER CHARGES

Product Code	Description	U.O.M.	Qty.	Chg. Y/N	Employee # Equip ID#
	Washout				
	Callout				
	Special Handling				
	Holiday Callout				
	TR Pre-Disposal				
	Recertification				

OFFICE USE:
Minimum Disposal Charge Y ☐ N ☐
Minimum Disposal Tax Y ☐ N ☐

SPLIT LOAD SITE 1 QTY 1 UNIT
2 2 UNIT

Comments: flush pt 50°C
EX O2 ND

Consistency Odor Analyst R. M. Wice
Reviewed By

026-150132

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.
CA 0000633115

2. Page 1
of 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

I.T. CORPORATION TRANSFER FACILITY
3010 ZANKER RD.
SAN JOSE CA 95131

4. Generator's Phone (408) 263-7250

A. State Manifest Document Number

87088102

B. State Generator's ID No.

CA 0000633115

5. Transporter 1 Company Name

I.T. TRANSPORTATION

6. US EPA ID Number

CA 0000058917

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

CASUALTY RESOURCES
NTH ROAD
CASUALTY CA 93429

10. US EPA ID Number

CA 0000070812

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HAZARDOUS WASTE
FLAMMABLE SOLID
UNREACTIVE

12. Quantity

0.9124

13. Total

1160

14. Unit

P

HAZARDOUS WASTE
FLAMMABLE SOLID
UNREACTIVE

12. Quantity

1160

13. Total

1160

14. Unit

P

GENERATOR COPY

GENERATOR'S CERTIFICATION

I, the undersigned, certify that the waste described above is a hazardous waste as defined by the Federal Resource Conservation and Recovery Act (RCRA) and is being transported by highway in accordance with the requirements of the Federal Hazardous Waste Transportation Act (HWTA) and the Federal Hazardous Waste Management and Planning Act (FHWMPA). I am a large quantity generator, and I have determined that the waste is being transported in a manner which minimizes the present and future threat to human health and the environment. I have made a good faith effort to minimize the waste generated and to ensure that the waste is properly managed and disposed of in accordance with applicable laws and regulations.

Printed/Typed Name

John K. Drake

Signature

[Signature]

Month Day Year

07/21/87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

GARY RICHARDS

Signature

[Signature]

Month Day Year

07/21/87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

[Name]

Signature

[Signature]

Month Day Year

[Date]

19. Discrepancy Indication Space

[Space]

[Space]

[Space]

[Space]

[Space]

[Space]

[Space]

[Space]

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Casualty Resources

Signature

[Signature]

Month Day Year

07/21/87

Yellow: TSDS SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

INSTRUCTIONS ON THE BACK

IN CASE OF AN EMERGENCY, CONTACT THE NATIONAL CHEMICAL HAZARD TREATMENT CENTER AT 1-800-852-7850

DHS 8022 A (1/87)

EPA 8700-22 (Rev. 9-86) Previous editions are obsolete.

HAZARDOUS WASTE PREDISPOSAL EVALUATION

575 Pacheco Boulevard • Martinez, CA 94553
Telephone: (415) 228-5100

3. GENERATOR INFORMATION:
GENERATOR NAME ALASKA PIPE LINE
MAILING ADDRESS 5317 MINNESOTA DR.
INVERMOUNT ALASKA 99502
SITE ADDRESS _____
EPA ID# AKD9809B3001
TECHNICAL CONTACT DAVE SUNDAY PHONE 907-2452598

C. CUSTOMER INFORMATION:
CUSTOMER NAME _____
ADDRESS SAME
CONTACT _____
PHONE _____
TRANSPORTER IT CORP.
EPA ID# CA D000058217

A. EVALUATION # 23908
WASTE STREAM# 88677
ACCT MGR NOEON
DATE SUBMITTED 5/8/87
CUSTOMER ID# 150136
ANALYTICAL CHARGES \$250
P.O./CONTRACT# _____
BILLING INSTRUCTIONS: 2221

D. WASTE DESCRIPTION: WASTE SOLVENTS
GENERATING PROCESS ITS CLEANING
VOLUME 200 GALLONS _____ CUBIC YARDS
FREQUENCY ☒ One Time ☐ Week ☐ Month ☐ Quarter ☐ Year
METHOD OF SHIPMENT ☒ Bulk Liquid ☐ Bulk Solid ☐ Drums
DRUM TYPE AND SIZE _____

E. SHIPPING INFORMATION:
D.O.T. PROPER SHIPPING NAME WASTE FLAMMABLE LIQUID, NOS
R.Q. UNCLAS 1993
HAZARD CLASS FLAMMABLE
RCRA WASTE? ☒ Yes ☐ No **CODE** D001
CA. HAZARDOUS WASTE? ☒ Yes ☐ No **CODE** 214
CA. RESTRICTED WASTE? ☐ Yes ☒ No

F. HAZARDS: LOW MOD HIGH YES NO
INHALATION ☒ ☐ ☐ ☐ ☒ PYROPHORIC
DERMAL ☒ ☐ ☐ ☐ ☒ EXPLOSIVE
ORAL ☒ ☐ ☐ ☐ ☒ SHOCK SENSITIVE
FLAMMABLE ☐ ☒ ☐ ☐ ☒ WATER REACTIVE
REACTIVITY ☒ ☐ ☐ ☐ ☒ OTHER
MATERIAL SAFETY DATA SHEETS ATTACHED? NO
SPECIAL HANDLING _____

G.
COLOR BLACK
ODOR SOLVENT
☒ Mild ☐ None
☐ Strong

H. PHYSICAL STATE:
☒ Liquids 100 % Free Liquids
☐ Solids ☒ Single Layer
☐ Sludge ☐ Double Layer
☐ Powder ☐ Multi-Layer

I. pH: UNK
☐ <2 ☐ 10-12
☐ 2-6 ☐ >12
☐ 6-8 ☐ _____ Exact
☐ 8-10

J. NORMALITY: UNK
☐ 0.1-1.0 ☐ 4.1-5.0
☐ 1.1-2.0 ☐ 5.1-6.0
☐ 2.1-3.0 ☐ >6.0
☐ 3.1-4.0 ☐ _____ Exact

K. SPECIFIC GRAVITY: UNK
☐ <0.8 ☐ 1.4-1.7
☐ 0.8-1.0 ☐ >1.7
☐ 1.0-1.2 ☐ _____ Exact
☐ 1.2-1.4

L. FLASH POINT: UNK
☐ 100F
☐ 100-140F
☐ 140-200F
Method _____

M. CHEMICAL COMPOSITION:
cleaning solvents 100 %
ACID TYPES _____
BASE TYPE _____
OXIDIZER TYPE _____
WATER _____
OIL _____
TOTAL 100%

UNK	YES	NO		PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CYANIDES	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FORMALDEHYDE	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PCB	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PHENOLS	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SULFIDES	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AMMONIA	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DIOXINS	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PESTICIDE	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PESTICIDE GROUP	PPM
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	HALOGENATED ORGANICS	PPM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OTHER	PPM

N. METALS: UNKNOWN
TOTAL _____ **SOLUBLE** _____
Ti _____ PPM Ti _____ PPM
As _____ PPM As _____ PPM
Hg _____ PPM Hg _____ PPM
Se _____ PPM Se _____ PPM
Pb _____ PPM Pb _____ PPM
Cd _____ PPM Cd _____ PPM
Ni _____ PPM Ni _____ PPM
Cr _____ PPM Cr _____ PPM
Cr+6 _____ PPM Cr+6 _____ PPM
V _____ PPM V _____ PPM
Be _____ PPM Be _____ PPM
Cu _____ PPM Cu _____ PPM
Fe _____ PPM Fe _____ PPM
Co _____ PPM Co _____ PPM
Zn _____ PPM Zn _____ PPM
OTHER _____
OTHER _____

O. ANALYTICAL INSTRUCTIONS: ☒ STANDARD PREDISPOSAL ☐ RUSH (subject to surcharge) ☐ REQUEST FOR ANALYSIS
SPECIFIC INSTRUCTIONS:
* CONTACT KEITH CARTER AS SOON AS RESULTS BECOME AVAILABLE

P. CERTIFICATION: I HEREBY CERTIFY THAT TO THE BEST OF MY KNOWLEDGE THE ABOVE INFORMATION AND ATTACHMENTS FULLY AND ACCURATELY CHARACTERIZE THE CHEMICAL AND PHYSICAL PROPERTIES OF THE WASTE STREAM. I UNDERSTAND THAT THIS SAMPLE IS ASSUMED BY IT CORPORATION TO BE REPRESENTATIVE OF THE WASTE STREAM AND THAT ACCEPTABILITY AND PRICE ESTIMATES BASED ON THIS SAMPLE MAY CHANGE ACCORDING TO THE COMPOSITION OF ACTUAL WASTES ANALYZED AT TRUCK RECEIVING.
NAME KEITH CARTER SIGNATURE [Signature] DATE 5/8/87 PHONE X3412

WORK ORDER -# 107-05-136
JOB # 88677
SERIES # 01 OF 1

Generator name: ALYESKA PIPELINE SERVICE CO.
Waste description: WASTE SOLVENTS
Generating Process: PARTS CLEANING
Volume / frequency: 200 GAL/ONE TIME

TEST	RESULT	UNITS
HCV	4000	ppm
DENSITY	840	G/L
PH	NA	PH
NORMALITY	NA	N
SON	NA	%
CN	NA	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
XS. OXIDANT	NA	
FLASHPOINT	29	DEG/C
AQUEOUS	TRACE	X
SOLID	TRACE	X
OIL	ND	X
POLAR	19	X
NONPOLAR	81	X
HALOGENATED	**	
PHENOL	**	ppm

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	ND (1	mg/kg
PHENOL	* 12000	ppm
CRESOL	85000	ppm
HALOGENATED	* 1.7	%

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

TEST	RESULT	UNIT
T1	ND @ 10	ppm
As	ND @ 10	ppm
Hg	ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	12	ppm
Ni	ND @ 10	ppm
Cr	80	ppm
Cr+6	NA	ppm
Be	ND @ 0.1	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

* Hg by cold vapor

LAE MANAGER:

DATE:

ACCEPT/REJECT:

REFRACCIÓN

TELEF. MANAGER:

DATE:

139 FACILITY:

SPECIAL SCHEDULING REQ. :

TREATY OF ~~1917~~ 1917 CEMENT

What is important to Henry and Winston?



ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE DATA MANAGEMENT SYSTEM
FACILITY INVENTORY MAINTENANCE FORM

CARD CODE	FACILITY IDENTIFICATION NUMBER	TRANS CODE	CARD NO.	NOTIFICATION APPROVAL	DATE NOTIFIED	PERMIT APPLICATION APPROVAL	DATE PART A PERMIT REC'D	FACILITY NAME
F	C.A.T.O. 80014079	1	1					
F	DUP	2						
F	DUP	3						
F	DUP	4						
F	DUP	5						
F	DUP	6						
F	DUP	7						
F	DUP	8						
F	DUP	9						
F	DUP	9						
F	DUP	9						
F	DUP	0						
F	DUP	C						

69

ARFA CODE CONTACT TELEPHONE NUMBER

55

MAILING ADDRESS

45

MAILING CITY

STATE

ZIP CODE

40 41 42 43 46 47 51

FACILITY ADDRESS

45

FACILITY CITY

STATE

ZIP CODE

COUNTY CODE

DISTRICT CODE

RIVER BASIN CODE

LATITUDE

LONGITUDE

40 41 42 43 46 47 51 52 54 55 56 57 58 59 64 65 71 72 79

NEW SIC

OLD SIC

NEW SIC

OLD SIC

NEW SIC

OLD SIC

NEW SIC

OLD SIC

19 20 23

19 20 23

19 20 23

19 20 23

FACILITY OWNER'S NAME

55

ACTIVITY CODE

TRANSPORT MODE

OWNER TYPE

GEN

TRANS

TED

UIC

AIR

RAIL

ROAD

WATER

OTHER

FAC. STAT.

PERM. STAT.

CLOSURE DATE

56 57 60 61 65 66 70 71 72 73 78

TYPE NEW PERMIT NUMBER

TYPE OLD PERMIT NUMBER

30 31 32 33 45

TYPE NEW PERMIT NUMBER

TYPE OLD PERMIT NUMBER

30 31 32 33 45

TYPE NEW PERMIT NUMBER

TYPE OLD PERMIT NUMBER

30 31 32 33 45

TYPE NEW PERMIT NUMBER

TYPE OLD PERMIT NUMBER

30 31 32 33 45

DATE NOTIFICATION ACKNOWLEDGEMENT SENT

DATE INTERIM STATUS ACKNOWLEDGEMENT SENT

21 22 27

COMMENTS

55



ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE DATA MANAGEMENT SYSTEM
FACILITY MAINTENANCE FORM

FACILITY IDENTIFICATION NUMBER													TRANS CODE		CARD NO.		NOTIFICATION APPROVAL		DATE NOTIFIED		PERMIT APPLICATION APPROVAL		DATE PART A PERMIT REC'D		FACILITY NAME													NOTIFICATION CONFIDENTIALITY		PART A CONFIDENTIALITY		CLOSURE DATE													
FACILITY IDENTIFICATION NUMBER													FACILITY CONTACT NAME/POSITION													AREA CODE CONTACT TELEPHONE NUMBER																													
FACILITY IDENTIFICATION NUMBER													MAILING ADDRESS													FACILITY IDENTIFICATION NUMBER													MAILING CITY													STATE		ZIP CODE	
FACILITY IDENTIFICATION NUMBER													FACILITY ADDRESS													COUNTY NAME																													
FACILITY IDENTIFICATION NUMBER													FACILITY CITY													STATE		ZIP CODE		COUNTY CODE		DISTRICT CODE		RIVER BASIN CODE		LATITUDE		LONGITUDE																	
FACILITY IDENTIFICATION NUMBER													SIC		NEW SIC		FACILITY IDENTIFICATION NUMBER													SIC		NEW SIC		FACILITY IDENTIFICATION NUMBER													SIC		NEW SIC						
FACILITY IDENTIFICATION NUMBER													FACILITY OPERATOR NAME													ACTIVITY CODE		TRANSPORT MODE		EXISTENCE DATE																									
FACILITY IDENTIFICATION NUMBER													TYPE		PERMIT NUMBER		TYPE		NEW PERMIT NUMBER		FACILITY IDENTIFICATION NUMBER													TYPE		PERMIT NUMBER		TYPE		NEW PERMIT NUMBER															
FACILITY IDENTIFICATION NUMBER													TYPE		PERMIT NUMBER		TYPE		NEW PERMIT NUMBER		FACILITY IDENTIFICATION NUMBER													TYPE		PERMIT NUMBER		TYPE		NEW PERMIT NUMBER															
FACILITY IDENTIFICATION NUMBER													DATE NOTIFICATION ACKNOWLEDGEMENT SENT		DATA INTERIM STATUS ACKNOWLEDGEMENT SENT		INTERIM STATUS ACKNOWLEDGEMENT II		FACILITY IDENTIFICATION NUMBER													OPERATOR PHONE		OPERATOR STREET																					
FACILITY IDENTIFICATION NUMBER													OPERATOR CITY		OPER STATE		OPERATOR ZIP CODE		INDIAN LAND		FACILITY IDENTIFICATION NUMBER													OWNER PHONE																					
FACILITY IDENTIFICATION NUMBER													FACILITY OWNER NAME													FACILITY IDENTIFICATION NUMBER													FACILITY OWNER CITY		OWNER STATE		OWNER ZIP CODE												
FACILITY IDENTIFICATION NUMBER													PROCESS CODE		AMOUNT		UNIT		NEW PROCESS CODE		NEW AMOUNT		NEW UNIT		FACILITY IDENTIFICATION NUMBER													PROCESS CODE		AMOUNT		UNIT		NEW PROCESS CODE		NEW AMOUNT		NEW UNIT							

CARD 18 COLUMN 54 DRAWING INDICATOR

CARD 19 COLUMN 50 MAP INDICATOR

CARD 18 COLUMN 54 PHOTOGRAPH INDICATOR

CARD 19 COLUMN 51 NATURE OF BUSINESS

RESPONDENT CONTACT RECORD

FACILITY ID NUMBER

CAT 080014079

COMPANY NAME

BAY AREA ENVIRONMENTAL

COMPANY ADDRESS

225 PARR BLVD

CITY

RICHMOND

STATE

CA

ZIP CODE

94801

CONTACT PERSON'S NAME/TITLE

BILL WAHBEH

TELEPHONE NUMBER

(415) 235 - 1393

CONTACT RECORD

DATE	CONTRACTOR'S INITIALS	ITEMS DISCUSSED/RESOLUTION
6/14/84	LY	call for the address change, but 415-235-1393 does ^(no of O Erickson) neither not attach to the current address ^{nor} facility.
6/14/84	LY	Later I called information, and get Tel: 235-9422, and also get contact with Bill Wahbeh. He will send in a letter stays ^{the original} address is closed, and the new address is 1125 Hendley St. I will send them a new notification.
6/14/84	LY	The new notification is sent out to Bill ^{the facility} today.
6/14/84	UB	Spoke w/ Mr. Wahbeh - Bay Area Environ. had orig. intended to open up a facility at 225 Parr Blvd on land owned by O Erickson Inc. O. Erickson decided not to go through with this agreement, consequently Bay Area Environ. started up their facility at 1125 Hendley, Richmond, CA.

FACILITY ID NUMBER

CAT080014079

BAY AREA ENVIRONMENTAL

COMPANY ADDRESS

CITY

STATE

ZIP CODE

1125 HENSLEY ST

RICHMOND

CA

94801

CONTACT PERSON'S NAME/TITLE

TELEPHONE NUMBER

DONALD OLIVA MGR

$$(4, 5), 2, 3, 5 - 9, 4, 2, 2$$

CONTACT RECORD

[illegible]

San Francisco County Office

(Seal)

Response to Comments on Draft Hazardous Waste Facility Permit
for
Bay Area Environmental Transfer Station

On May 5, 1983, the Department of Health Services (DOHS) held a public hearing to discuss its plans to issue hazardous waste facility permits to six companies. Approximately 60 people attended the hearing. The general permit process and standard permit conditions were presented by DOHS staff prior to the hearing of comments on each individual facility permit.

The Bay Area Environmental (BAE) facility permit was the first agenda item. The permit would allow BAE to receive and store hazardous wastes at the facility, which is located in Richmond, California, prior to recycling or disposal at other regulated facilities. A short presentation of specific permit conditions was made by DOHS staff. The consultant for Bay Area Environmental made a presentation illustrated with slides. A staff person from the Richmond Redevelopment Agency made a statement that BAE met the zoning requirements for that area of Richmond. After the comments from the public (discussed below) a letter from Tom Powers, 1st District Supervisor of Contra Costa County, in support of the facility was read.

Six people presented comments during the hearing and one person made comments over the phone afterwards.

A tape of the hearing and records of the phone calls are part of the administrative record, and are available for review at this department's Berkeley office. The comments presented fall into the following categories:

- 1) Public notification
- 2) Land use
- 3) Transportation
- 4) Flooding
- 5) Security
- 6) Wastes handled
- 7) Noise, odors
- 8) Air emissions
- 9) Groundwater
- 10) Noncompliance of facility
- 11) Viability of facility

Each of these will be addressed separately.

As a result of these comments the following condition was added to the final permit:

Special Condition III.3.b. If wastes are found on the property outside the facility fence they shall be handled in such a manner as to prevent public contact and be in accordance with the operation plan.

The Department of Health Services, Hazardous Waste Management Branch proposes to issue the final permit with this added condition on or approximately July 1, 1983.

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1. Public Notification

Many commentors stated the community was inadequately notified about the proposed issuance of this permit. The question was asked if an Environmental Impact Report had been prepared for this facility. The question was also asked why permit hearings from facilities located all over the Bay Area were being held on one day in Berkeley rather than in the communities where the facilities are located.

Reply:

The public notification for this permit was as required by state and federal law. All local government agencies and all local citizens groups that had requested notification were notified. We believe this was adequate notification.

In the future, notification of all permit hearings for facilities located in Richmond will be sent to:

Gray Panthers of West Contra Costa County
Richmond Neighborhood Coordinating Council
North Richmond Homeowners and
Concerned Citizens Council
Pt. Richmond Neighborhood Council
North Richmond Missionary Baptist Church
Davis Chapel C.M.E. Church

A Negative Declaration (instead of an Environmental Impact Report) for this project was written by the Department of Health Services, Hazardous Waste Management Branch and submitted to the State Clearinghouse for review on January 13, 1983.

The holding of several permit hearings for facilities located in various areas of the Bay Area on one day in one location is consistent with other state agencies. We do not consider the distance to Berkeley an unreasonable length to travel from other locations in the Bay Area. Additionally, comments may be submitted in writing and/or over the telephone.

2. Land use

Many commentors stated that a hazardous waste storage and transfer facility was an inappropriate land use in an urban area. They therefore suggested that no permit be issued for this facility. There were also questions regarding city permits for this facility.

Reply:

Traditionally, and legally, appropriate land use is a local, rather than a State, decision. The State Health and Safety Code (Section 25200) requires the Department to issue permits to those facilities which meet the requirements contained in the code. The only land use conditions in the code apply to hazardous waste disposal property or

border zone property, neither of which are the case under consideration here. Therefore, this permit will not be denied on the basis of an inappropriate land use.

Questions regarding the city permit should be directed to the City of Richmond. During the hearing, however, there was a commitment made that we would address the question regarding "heat loss" on the city permit. Heat loss calculations are required as part of the information submitted for a building permit to show how much heat is needed to heat a building. The owner of the proposed building is then restricted from installing a heating unit that will provide more heat than is necessary to heat the building, thus conserving energy. Heat loss has nothing to do with a hazardous waste facility permit.

3. Transportation

Many commentors were concerned about the transportation of hazardous wastes through Richmond, chemical spills, and the amount of traffic to be generated by this facility. Other commentors were concerned about whether trucks would be washed at the facility.

Reply:

Legal requirements that facility permits are designed to enforce do not include transportation routes and methods. The transportation of hazardous wastes is governed by a variety of federal and state laws and regulations which are enforced by various agencies such as the California Highway Patrol and the Department of Health Services/Hazardous Waste Management Branch - Hazardous Waste Hauler Registration Program. Because of existing regulation, and the lack of a legal basis no additions have been made to the permit regarding waste transportation.

Additionally, during the public hearing the consultant to this project stated that the traffic pattern the facility intended to follow was Hensley Street, Castro Street and Highway 17. These streets pass through heavily industrialized areas.

The facility operator has estimated that two to three trucks per day would be entering and leaving the facility.

No trucks will be washed out at the facility as stated in the operation plan.

4. Flooding

Some commentors were concerned about the possibility of flooding at the facility.

Reply:

The location of the facility was checked against the National Flood Insurance Program map for Richmond. The facility does not lie within a 100 year floodplain. The closest area subject to flooding from a 100 year flood is approximately 1600 feet to the northwest of the

facility along Gertrude Avenue. Legally, and in our opinion, protection from a 100 year flood is sufficient protection for the public health and environment.

5. Security

Some commentators were concerned about the security of the site.

Reply:

The operator has stated that he will have barbed wire installed on the top of the six foot, chain-link fence. In addition, inspections will be made of the facility on the days that it is not open which will include: condition of fence, gate, drums and noticing if any wastes have been left outside the facility. These wastes will be brought into the facility and overpacked in the appropriate drums.

A special condition has been added to this permit which requires the facility to remove any wastes left outside the facility and handle them in accordance with the operation plan.

We feel that the combination of fences and daily inspections provides adequate security for this facility.

6. Wastes

Several questions were raised concerning the types of wastes and their handling at the facility; are explosives handled, are extremely hazardous wastes handled, what does the limit on water reactive wastes mean, why are water reactive wastes stored in the caustic area where they might come into contact with water if the drums fall over in the event of an earthquake, and concern that wastes being handled will be from people who have not been properly caring for their wastes.

Reply:

The purpose of the permit is to ensure that the wastes are handled safely. The specific questions posed above are answered below.

Explosives are specifically prohibited from being handled at this facility.

The facility is allowed to handle extremely hazardous wastes as long as they are accompanied by an Extremely Hazardous Waste (EHW) Disposal Permit issued by this department. This permit must accompany any extremely hazardous waste and its manifest from its point of generation to its final disposal site. This facility would merely be an in-transit storage site, not a disposal location.

The amount of water reactive wastes disposed of in California yearly is miniscule as compared to the total amount of hazardous waste disposed of (a few tons vs. approximately 2.5 million tons).

From past experience we would expect that the water reactive wastes that would be brought to this facility would be small amounts of laboratory research chemicals which are disposed of in relatively small quantities (ounces to pounds) rather than wastes generated by industrial processes.

As a prudent measure we did not want this facility to handle large quantities of water reactive waste at one time. In our judgement a limit of five gallons would pose a minimal risk.

Furthermore, the Department will exercise a continuing control on the acceptance of water reactive wastes on a case by case basis through the EHW Disposal Permit Requirements. Each of these permits must be individually reviewed and issued before the waste can leave the generator's facility and be transported to this facility. This will allow us to disapprove of acceptance at the facility of any water reactive wastes for reasons of quantity or special hazards.

Because of the small amount of water reactive wastes liable to be received, the facility did not want to establish a separate area for these wastes. However, because they might occasionally receive a water reactive waste it was determined that a safe location would be the caustic area.

Many water reactive wastes evolve acid vapors when they come into contact with water. In event of spillage or other occurrence in which water reactive wastes come into contact with other liquids, if the latter were caustic solutions they would neutralize and thereby mitigate any potentially harmful effects of the acid fumes. For water reactive wastes which do not evolve acid fumes, the caustic wastes would not likely exacerbate the reactivity. By intent, the water reactive wastes were not stored with either the flammables or the oxidizers. since in our view these would be potentially unfavorable environments.

As stated in the operation plan, overpack drums will be available at the facility in case a leaking drum is received or a drum develops a leak while at the facility. Wastes in leaking packages brought in by homeowners will be packed in drums with sufficient absorbent to absorb all liquid.

7. Noise and odors

Some commentors expressed concern over possible noise and odors which might be produced at the facility.

Reply:

Regulation of these concerns is provided by the city through the issuance of their permits.

8. Air emissions

Some commentors were concerned about possible air emissions from this facility.

The amount of water reactive wastes disposed of at this facility is small compared to the total amount of waste disposed of at this facility.

Reply:

The Bay Area Air Quality Management District was contacted regarding the necessity of a permit for this facility. Because there are no planned emissions from this facility no air district permit is required.

The permit conditions are designed to minimize spills and/or accidental emissions. It is our opinion that the location and method of handling wastes at this facility pose no unusual threats to neighboring business activities or residences.

9. Groundwater

One commentor questioned whether the Regional Water Quality Control Board had been contacted or involved in this permit.

Reply:

A copy of the draft permit was sent to the San Francisco Bay Regional Water Quality Control Board (the "Board") for review. The Board reviewed the draft permit and stated that they believed that "the operation of this facility should not pose any water quality concerns and therefore we have no comment on the draft permit."

10. Noncompliance of facility

Several commentors stated that they felt that the facility would not comply with the conditions of the permit. They felt that there would be inadequate enforcement on the part of the Department of Health Services. The comment was also made that the state hasn't kept track of chemicals in the past.

Reply:

This facility will be inspected on a yearly basis. In addition, any complaints regarding possible violation(s) of the permit or the Hazardous Waste Law and Regulations will be investigated.

With regard to the comment relating to inadequate tracking of chemicals, the Department of Health Services now has a new computer system for managing manifests for hazardous waste shipments.

11. Viability of the facility

Some commentors were concerned that this would not be a viable facility.

Reply:

We acknowledge that this is the first facility of its kind in this region and that actual homeowner use is unknown at this time. However, this office does receive approximately 50 calls a month

from homeowners wanting to know of facilities such as this one.

In case this facility did not prove viable and had to close, monies are available for removal of all hazardous waste through the financial mechanism required in the permit.

The permit conditions are designed to minimize spills and/or accidental emissions. The permit also requires that the facility maintain records of all hazardous waste at this facility post no unusual chemical or physical business activities or releases.

7. STORAGE

The permit requires that the facility maintain adequate storage for all hazardous waste received at the facility through the permit.

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